

*This 2024 SWMP Plan is required by the Department of Ecology for
NPDES Phase II Western Washington Municipal Stormwater Permit Compliance*

2024 Stormwater Management Program Plan for

City of Lake Forest Park



March 27, 2024

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INTRODUCTION

The City of Lake Forest Park (“the City”) operates a municipal separate storm sewer system (MS4) that collects, conveys, and discharges stormwater to surface waters regulated by the Federal government and State of Washington. The *Western Washington Phase II Municipal Stormwater Permit* (“the Permit”) is the regulatory mechanism used to control these discharges and is authorized by the Federal Clean Water Act and associated National Pollutant Discharge Elimination System (NPDES). In the state of Washington, the Department of Ecology (“Ecology”) administers the Permit on behalf of the Federal Environmental Protection Agency (EPA). Ecology updates and reissues the Permit approximately once every five years. The Permit was first issued in 2007, and the current/active Permit term began in August of 2019 and will conclude in July of 2024.

The intent of the Permit is to protect surface water quality, thereby enabling surface waters to support a variety of beneficial uses that may include recreation, wildlife habitat, drinking water supply, and other uses. Accordingly, the Permit requires the reduction of pollutant discharges from the City’s MS4 to regulated receiving waters to the maximum extent practicable (MEP) using all known, available, and reasonable methods of prevention, control and treatment (AKART). To comply with the MEP and AKART standards, Permittees are required to adopt a stormwater management program (SWMP) comprised of several distinct pollution prevention and abatement activities.

In addition to developing and implementing a SWMP, Permittees are required to prepare a public-facing document that describes SWMP activities they have planned for the forthcoming calendar year¹. This document, known as the City’s SWMP Plan, fulfills that requirement. It is organized in sections that correspond to the Permit’s requirements governing the SWMP. Each section describes what the Permit requires and how the City plans to meet the requirement(s), and is organized into the following typical sub-sections:

1. Permit Requirements
 - This sub-section includes language excerpted from the Permit describing requirements the City must fulfill during the Permit term. Importantly, this includes a description of certain “minimum measures” the City must satisfy to demonstrate compliance with the requirements. Deadlines that may be applicable to each requirement are also noted here.
2. Current City Activities
 - This sub-section includes descriptions of efforts the City has completed previously or performs on a routine basis to comply with Permit requirements. Instances in which the City has fulfilled its Permit requirement(s) completely and needn’t take further action, where applicable, are described here.
3. Planned Activities
 - This sub-section includes descriptions of compliance efforts the City specifically plans to undertake and/or complete in the forthcoming year.

¹ The Permit requires that the City annually update the SWMP Plan and make it publicly accessible on or before March 31. This SWMP Plan is posted on the City’s website and available for the public’s review at City Hall.

4. Lead Department and Support

- The sub-section includes descriptions of which resources the City intends to utilize to complete ongoing and planned compliance work. Achieving compliance requires contributions from a variety of City staff including public works crew members, engineers, planners, code enforcement officials, finance professionals, administrators, and others. The assistance of external partners and vendors is often necessary as well including GIS mapping specialists, waste management vendors, inspectors, etc. and these contributions are also acknowledged in this sub-section.

I. STORMWATER PLANNING

I.1 Permit Requirements

Permit Section S5.C.1 requires that the City develop and implement a stormwater planning program consisting of the following elements:

- Assemble an inter-disciplinary team to inform and assist in the development, progress, and influence of the comprehensive stormwater planning program by August 1, 2020.
- Describe how stormwater impacts to receiving water quality were addressed in past Comprehensive Plan updates or other long-range land use plans during the 2013-2019 permit term (due by March 31, 2021) or are being addressed in the current permit term (due by March 31, 2023), if at all.
- Continue to require Low Impact Development (LID) Principles and LID Best Management Practices (BMPs) in local development-related codes, making LID the preferred and commonly used approach to site development. This includes annually assessing and documenting administrative or regulatory barriers to LID implementation and document measures developed to address said barriers.
- Develop a Stormwater Management Action Plan (SMAP) by following a similar process and considering the range of issues outlined in Ecology's 2019 Stormwater Management Action Planning Guidance document (Publication 19-10-010). The following elements must comprise the SMAP:
 - A Receiving Water Assessment that documents the existing conditions of the City's receiving waters and associated basins and identifies which receiving waters are most likely to benefit from stormwater management planning. The assessment must include a watershed inventory, submitted as a table and accompanied by a map, that documents each receiving water name, its total watershed area, and the percent of the total watershed area that is in the Permittee's jurisdiction. Additionally, permittees must conduct a stormwater management influence assessment for each basin and determine which basins should be included in a prioritization process used to determine where stormwater management actions will be focused. This assessment must be completed by March 31, 2022.
 - A Receiving Water Prioritization process to determine which receiving waters will receive the most benefit from implementation of stormwater facility retrofits, tailored implementation of SWMP actions, and new land/development management actions. A ranked list of receiving waters developed per the prioritization process must be completed by June 30, 2022.
 - A Stormwater Management Action Plan for at least one high priority basin, completed by March 31, 2023, that includes:
 - A description of the stormwater facility retrofits needed for the area, including types and preferred locations.
 - Land management/development strategies and/or actions identified for water quality management.
 - Targeted, enhanced, or customized implementation of stormwater management program actions, e.g. IDDE field screening, Prioritization of Source Control

inspections, O&M inspections or enhanced maintenance, or Public Education and Outreach behavior change programs.

- If applicable, identification of changes needed to local long-range plans to address SMAP priorities.
- A proposed implementation schedule and budget sources for Short-term actions (i.e., actions to be accomplished within six years), and Long-term actions (i.e., actions to be accomplished within seven to 20 years).
- A process and schedule to provide future assessment and feedback to improve the planning process and implementation of procedures or projects.

1.2 Current and Completed Activities

The City has completed or routinely performs the following activities to comply with this Permit section:

- In 2020, the City created an inter-disciplinary team to inform the stormwater planning program and held a kickoff meeting. The inter-disciplinary team includes staff from the City's Planning, Public Works, and Engineering departments. In 2021, team members compiled existing information to inform the SMAP and contracted with a professional engineering consultant, Parametrix, Inc., to assist the City in completing the SMAP process and develop several Permit-required deliverables. In 2023, the City contracted with Aspect Consulting to support the inter-disciplinary team across a range of stormwater planning activities.
- The City's 2020 annual report to Ecology described the City's recent long-range planning efforts undertaken during the previous Permit term and stormwater management capital projects and other measures that resulted therefrom. This report is available for review by request.
- The City continues to make LID the preferred and commonly used approach to site development through the use of local development-related codes, rules, standards and other enforceable documents. Applicable sections of the City's municipal code that address this requirement include:
 - Chapter 16.08 (Clearing and Grading)
 - Chapter 16.14 (Tree Canopy Preservation & Enhancement)
 - Chapter 16.24 (Drainage Plans)
 - Chapter 16.25 (Water Quality)
 - Chapter 18.48.030 (Commercial Site Development Permits)
- The City annually assesses, documents and reports any identified administrative or regulatory barriers to LID implementation.
- In 2022, the City completed the Receiving Water Assessment and Prioritization Process for the SMAP and posted the resulting reports to the City website (<https://www.cityofflp.gov/656/Stormwater-Management-Action-Plan>). These efforts were informed by public feedback collected per the project's Public Outreach Plan. Feedback collection efforts included:
 - Social media and newsletter posts

- Email updates to City-website-based project email subscribers
 - Direct outreach by phone and email to stakeholders including the City Council, Muckleshoot Tribe, LFP StreamKeepers and others
 - Deployment of an interactive feedback collection website
 - Live basin prioritization workshop held via Zoom.
- In 2023, the City completed the SMAP and posted the resulting report to the City website

1.3 Planned Activities

The following table outlines the implementation plan for this year to achieve the goals and objectives of the Stormwater Planning Program and meet the compliance deadlines in the Permit.

Table 1-1 Stormwater Planning		
Purpose: 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.		
Task ID	Task Description	Schedule Notes
SP-1	The implementation of the short term stormwater management actions as described in the SMAP could be impacted by the next Permit (scheduled to be finalized in July 2024). Next steps will be determined after the Permit is finalized.	Due date: N/A
SP-2	Continue implementing the routine activities related to LID code application and barrier elimination described in Section 1.2.	Due date: N/A, Ongoing

1.4 Lead Department and Support

The Public Works Department has the primary responsibility for implementing Stormwater Planning activities and receives support from the City Community Development Department and engineering consultants (private companies).

2. PUBLIC EDUCATION AND OUTREACH

This section describes the permit requirements, current city activities, and planned actions to be implemented.

2.1 Permit Requirements

S5.C.2 requires the following:

- Provide an education and outreach program for the area served by the MS4. The program shall be designed to:
 - Educate target audiences about the stormwater problem and build general awareness of methods or actions they can follow to minimize and reduce impacts from stormwater runoff.
 - Annually select one target audience and one subject area and provide information on an on-going or strategic schedule.
 - Effect behavior change to reduce or eliminate behaviors and practices that cause or contribute to stormwater impacts.
 - Select one target audience and one Best Management Practice (BMP) for the behavior management campaign.
 - By February 1, 2021, follow social marketing practices and methods similar to community-based social marketing and develop a campaign that is tailored to the community.
 - Develop a strategy and schedule for a new target audience and BMP behavior change campaign.
 - Based on the effectiveness evaluation, follow and apply social marketing practices (similar to Community-Based Social Marketing) to develop a behavior change program that is tailored to the community and inclusive of an evaluation plan.
 - By March 31, 2024, evaluate and report on the effectiveness of the ongoing behavior change program and document lessons learned.
 - In an adaptive management format, continue to update, evaluate, re-implement behavior change program.
 - Create stewardship opportunities and/or partner with existing organizations to encourage community engagement and participation in activities or events planned or organized within the community, in addressing impacts from stormwater runoff.

2.2 Current and Completed Activities

The City of Lake Forest Park has several informal and formal programs. Current efforts have included the following activities:

- Volunteer storm drain labeling program.
- Articles on City's website Newsflash's, Facebook, Twitter, Instagram, and Nextdoor are posted containing water quality education, water quality outreach promoting events and other relevant education.
- Water quality sampling on McAleer Creek and Lyon Creek watersheds by volunteer-led StreamKeepers.
- Distribution of educational materials through interlocal agreement with King County Water and Land Resources Division and at City events.

- Adopt-a-Drain program that encourages residents to monitor a catch basin.
- Organized a booth at the local Lake Forest Park Green Fair, City Sponsored Community Events, Family Day at the Farmers Market, partnered events with the ShoreLake Arts (concerts in the park/Battle of the Bands) to promote awareness of stormwater pollution and actions citizens can take to reduce their impact/recognize a spill.
- City webpage that is devoted to informing citizens about stormwater issues.
- Participant in the Lake Ballinger/McAleer Creek Forum that holds regular public meetings to discuss a basin-wide strategic action plan that addresses water quality and quantity.
- Materials are distributed at City Hall, public meetings, staff meetings, and at the Community Development Department counter.
- “Only Rain Down the Drain” Vehicle Magnets on City vehicles and in the City Hall lunchroom to educate both the public and City staff about water quality issues.
- Informational Brochures are used by Public Works crew to carry in their vehicles to distribute to residents in need or for use by Public Works employees (e.g., what to do after a spill).
- Stormwater Awareness with City Staff: regular emails and notices directing staff to Puget Sound Starts Here webpage and other educational materials.
- “Puget Sound Starts Here Month” Awareness – September.
- Stormwater education messages were inserted in the quarterly City Newsletter and monthly eNews.
- Natural Yard Care workshop supported by the City to educate residents on better yard care practices and stormwater awareness at the City’s Earth Smart Green Fair.
- The City of Lake Forest Park joined in with regional partners to support outreach for management of solid waste dumpsters at commercial waste areas in 2020. A pilot program of commercial dumpster awareness was developed and deployed in 2021. During the pilot program, a commercial property owner received educational literature and direct coaching from City staff regarding the water quality benefits of keeping solid waste dumpster lids properly closed. The owner’s performance in following this guidance was documented before and after this education was provided, and the City determined that the educational effort helped inspire a meaningful performance improvement. In 2023, implementation of dumpster outreach efforts continued throughout the City. Additional details are provided with the City’s 2023 Annual NPDES Report.
- The City has chosen to address closing and keep closed dumpster lids as the behavior change campaign and will submit a report summarizing the results and recommendations as part of the 2023 Annual Report.
- The City supports forest restoration work parties led by the local LFP Stewardship Foundation that focus on education and restoration to receive training in best management practices and natural yard care.

2.3 Planned Activities

The following table outlines the implementation plan for this year to achieve the goals and objectives of the Public Education and Outreach Program and meet the compliance deadlines of the Permit.

Table 2-1 Public Education and Outreach		
Purpose: Provide an education and outreach program for the area served by the MS4. The program shall be designed to educate target audiences about the stormwater problem and provide specific actions they can follow to minimize the problem.		
Task ID	Task Description	Schedule Notes
EDUC-1	Puget Sound Starts Here Month – <u>General Awareness</u> The City will support Puget Sound Starts Here Month in 2024. The celebration will begin with a proclamation at a City Council meeting and continue throughout the month and beyond with social media education and promotion.	Due Date: September 2024
EDUC-2	Storm Drain Labeling Challenge – <u>Stewardship Opportunities</u> The City will continue to challenge the community to label storm drains throughout Lake Forest Park.	Due Date: N/A, Ongoing
EDUC-3	City Quarterly Newsletters and Monthly eNews – <u>General Awareness/Stewardship Opportunities</u> The City will distribute stormwater education articles with City quarterly newsletters and monthly eNews	Due Date: N/A, Ongoing
EDUC-4	Distribute educational videos through the City’s local TV Channel – <u>General Awareness</u> The City will continue to show “Certain Things Don’t Mix” and “Car Care” Commercials on rotating basis on the City’s local TV Channel, post them on social media, and promote them through other means where possible.	Due Date: N/A, Ongoing
EDUC-5	Natural Yard Care Promotion – <u>Stewardship Opportunities</u> The City will host and/or support natural yard care workshops to educate homeowners on best management practices towards behavior changes while providing education/training.	Due Date: April 29, 2024, Ongoing
EDUC-6	Regional and Local Coordination – <u>General Awareness</u> The City will continue to work with local jurisdictions to continue regional and local stormwater coordination to send consistent educational messaging around the region and local cities; this includes Bus Ads in the north/west King County area, and other ideas/options will be looked at.	Due Date: Ongoing

EDUC-7	<p>Dumpster Lid Campaign - Behavior Change Program</p> <p>The City completed a 2021 pilot program in coordination with regional partners. The program was expanded to engage additional commercial site owners and included an additional round of education and performance monitoring.</p> <p>The City will evaluate and report on:</p> <ul style="list-style-type: none"> • Changes in understanding and adoption of targeted behaviors resulting from the implementation of the pilot program. • Any planned or recommended changes to the pilot program to increase effectiveness. 	Due Date: March 31, 2024
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2.4 Lead Department and Support

The Public Works Department has the primary responsibility for implementing Public Education and Outreach activities.

3. PUBLIC INVOLVEMENT AND PARTICIPATION

This Section describes the Permit requirements, and current and planned compliance activities.

3.1 Permit Requirements

Section S5.C.3 of the Permit requires the City to:

- Create opportunities for the public, including overburdened communities to participate in the decision-making processes involving the development, implementation and update of the City's SMAP and SWMP.
- Post the SWMP Plan and the annual report to the City website no later than May 31 each year. All other submittals shall be available to the public upon request.

3.2 Current and Completed Activities

Current City of Lake Forest Park activities in this area include:

- The City's administration is updated as needed and contributes to decision making regarding NPDES Phase II Permit requirements and stormwater projects affecting the MS4.
- At City events, the public has the opportunity to provide feedback verbally (to City staff) or on comment forms provided at each event.
- City booths at the local Earth Smart Green Fair, Farmers Markets, City sponsored or attended community partner events provide opportunities for public involvement and education.
- Online, Request for Service form is available on our City website, along with City Staff email addresses to submit comments or concerns.

- The annual report is posted on the City of Lake Forest Park website.
- In 2022 and 2023, the City provided numerous opportunities for City residents and others to provide input on the SMAP including a virtual open house, a survey, and live/virtual basin prioritization workshop. See Section 1 of this SWMP Plan for additional details.

3.3 Planned Activities

The following table outlines the implementation plan for this year to achieve the goals and objectives of the Public Involvement Program and meet the compliance deadlines in the Permit.

Table 3-1 Public Involvement		
Purpose: Create opportunities for the public to participate in the decision-making processes involved in the development, implementation and update of the SWMP.		
Task ID	Task Description	Schedule Notes
PI-1	Make opportunities available for the public to provide input on the draft SWMP Plan. Council meetings are public meetings where public comment is open to provide input on the SWMP. Council meeting are currently being held in hybrid (virtual and in-person) format. Details on how to participate in the meeting are posted to all agendas. Booths at community events are staffed with City representatives and provide opportunity to the public to comment on the SWMP. The City also provides opportunity and direction on how to submit feedback on the website.	Due date: March 31, 2024
PI-2	Post the SWMP Plan, annual report, and any other documents related to stormwater permit on the City's website.	Due date: May 31, 2024
PI-3	Continue providing routine opportunities for the public to submit comments or concerns related to our stormwater programs, as described in Section 3.2.	Due Date: N/A, Ongoing

3.4 Lead Department and Support

The Public Works Department has the primary responsibility for implementing Public Involvement activities.

4. MS4 MAPPING AND DOCUMENTATION

This section describes the permit requirements, programs and planned activities related to Municipal Separate Storm Sewer System (MS4) Mapping and Documentation.

4.1 Permit Requirements

Section S5.C.4 of the Permit requires the City to:

- Complete or perform ongoing mapping and documentation of the MS4 and related features, including:
 - Known MS4 Outfalls or discharge points. Starting Jan 1, 2020 note pipe size and material of outfalls.
 - Receiving waters, other than groundwater.
 - City-owned or operated Stormwater Treatment and Flow Control Facilities/BMPs.
 - Geographic areas served by the MS4 that do not discharge to surface waters.
 - Tributary conveyances to known outfalls of 24-inch diameter or larger, or equivalent cross-sectional area for non-piped outfalls. Document conveyance type, material and size (where known). Associated drainage areas and land use.
 - Connections between the owned MS4 and other municipal or public entity conveyance systems.
 - All connections to the MS4 authorized or allowed by the City after February 16, 2007.
 - Before August 1, 2023, map all known connections from the MS4 to privately owned stormwater systems.
- Starting August 1, 2021, the required format for mapping is electronic, with fully described mapping standards.

4.2 Current and Completed Activities

The City has completed or routinely performs the following activities to comply with this Permit section:

- The City developed an inventory of its MS4 assets and an associated GIS map in 2010.
- The City routinely updates its inventory and GIS map as new information is discovered or changes are made to the system to maintain compliance with the Permit. For instance, outfall size and material information, which was originally compiled per the 2010 inventory process, is confirmed or updated as necessary during annual illicit discharge screening.
- The City developed an MS4 mapping standards document in 2021 that establishes policies for how the Permit's required mapping elements are represented in GIS, e.g. feature class type for each asset/element, attributes collected for each feature class, data definitions and naming conventions for attributes, etc.

- The City completed mapping of all known connections from the MS4 to privately owned stormwater systems in 2023 and continues to identify and map connections to private stormwater systems as new information is acquired. This includes a review of available land development project permit records, MS4 asset data collection performed as part of biannual catch basin inspections, and GIS-based documentation of potential connections requiring additional investigation.

4.3 Planned Activities

The following table outlines the implementation plan for this year to achieve the goals and objectives of the MS4 Mapping and Documentation Program and meet the compliance deadlines in the Permit.

Table 4-1 MS4 Mapping and Documentation		
Purpose: Continue Mapping program and complete (as needed) updates and incorporation of MS4 data in an electronic format.		
Task ID	Task Description	Schedule Notes
MAP-1	Continue updating existing, required MS4 GIS mapping as new information is acquired.	Due Date: N/A, Ongoing
MAP-2	Continue to map connections from the MS4 to privately-owned stormwater systems as new information is acquired, including review of recorded property documents, field investigations, and other research to confirm asset ownership and operating responsibilities.	Due date: N/A, Ongoing
MAP-3	Continue GIS training for City staff to maintain and expand proficiency with GIS software and reduce reliance on consultant GIS support.	Due date: N/A, Ongoing

4.4 Lead Department and Support

The Public Works Department (DPW) has the primary responsibility for implementing MS4 Mapping and Documentation activities. DPW frequently relies on specialized technical support to complete these activities. For instance, the City hired a seasonal GIS intern in 2019 and 2021-2022 to assist with MS4 mapping updates and contracts with professional GIS consultants for support as needed.

5. ILLICIT DISCHARGE DETECTION AND ELIMINATION

This section describes the permit requirements, programs, and planned activities related to Illicit Discharge Detection and Elimination (IDDE).

5.1 Permit Requirements

Section S5.C.5 of the Permit requires the City to:

Implement an ongoing program designed to prevent, detect, characterize, trace and eliminate illicit discharges, including spills and illicit connections, into the City's MS4.

- The program shall include procedures for reporting, correcting and/or removing illicit connections or discharges when they are identified. Procedures shall also address pollutants entering the MS4 from an interconnected system.
 - Illicit connections and illicit discharges must be identified using but not limited to: field screening, inspections, complaints/reports, construction inspections, maintenance inspections, source control inspections, and/or monitoring information as appropriate.
- Inform the general public, public employee and businesses of the hazards associated with illicit discharges and improper disposal of waste.
- Implement an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges into the City's MS4 to the maximum extent allowable under state and federal law.
 - Implement an ordinance or other regulatory mechanism shall include escalating enforcement procedures and actions.
- Implement ongoing program designed to detect and identify illicit connections and non-stormwater discharges into the City's MS4.
 - Procedures for conducting investigations of the City's MS4 to identify potential pollutant sources.
 - Implement field-screening methodology appropriate for the characteristics of the MS4 and water quality concern. The City may use the updated Illicit Connection and Illicit Discharge (IC-ID) Field Screening and Source Tracing Guidance Manual (2020, Herrera Environmental Consultants and Aspect Consulting) or another of comparable or improved effectiveness.
 - Document the field screening methodology in the annual report.
 - Complete field screening for an average of 12% of the MS4 each year. Annually track total percentage of the MS4 screened beginning August 1, 2019.
 - Publicly list a hotline or other phone number for publicly reporting spills or other illicit discharges.
 - Train staff who are responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, including spills, and illicit connections, to conduct these

activities. Ongoing and follow-up training shall be provided as needed to address changes in procedures techniques, requirements or staffing. The City shall document and maintain records of the training provided and the staff trained.

- Implement an ongoing program to address illicit discharges (IDs), including spills or illicit connections (ICs) into the City's MS4 (Spill response).
 - Procedures for characterizing the nature of the environmental threat of the illicit discharge found or reported.
 - Procedures for tracing the source of an illicit discharge.
 - Procedures for eliminating the discharge, including coordination with appropriate authorities and responsible party.
 - Compliance timelines:
 - Immediate for IDs that are a threat to human health, welfare, or the environment.
 - Investigate within 7 days on average any complaints, reports, or monitoring information of a potential ID.
 - Initiate investigation within 21 days of known or suspected ICs.
 - Eliminate documented ICs within 6 months.
- Track and maintain records of the activities conducted to meet the requirements of this section. Submit data specified in Appendix 12 and WQWebIDDE as a part of the annual report.

5.2 Current and Completed Activities

The City has completed or routinely performs the following activities to comply with this Permit section:

- City adopted Lake Forest Park Municipal Code (LFPMC) 16.25 that addresses prohibited discharges, illicit connections and enforcement through City Ordinance 1241 on July 28, 2022.
- Adopted the 2021 King County Stormwater Pollution Prevention Manual by reference in LFPMC 16.25.035 through City Ordinance 1241 on July 28, 2022.
- Adopted the 2021 King County Washington Surface Water Design Manual by reference in LFPMC 16.24.10(B) through City Ordinance 1241 on July 28, 2022.
- The City's Public Education Program informs the public throughout the year regarding hazardous waste concerns, water quality concerns, common illicit discharges and proper BMPs for various topics of concern. i.e. car washing, pet waste, fertilizer/natural yard care. See Section 2 for more information regarding the Public Education Program.
- Field screening is performed annually (typically at outfalls) and follows the guidelines of the Illicit Connection and Illicit Discharge (IC-ID) Field Screening and Source Tracing Guidance Manual (Herrera Environmental Consultants and Aspect Consulting, May 2020). The City hired an engineering consultant in 2023 to complete the field screening and 12 percent of the MS4 was screened at the outfalls based on conveyance length associated with each outfall structure.

- The City operates a 24-hour phone line that allows citizens to report illicit discharges or illicit dumping. During business hours, calls are directed to the City’s Public Works Department. Afterhours calls are processed by King County (dispatch) through an interlocal agreement. Calls are recorded and logged as action requests electronically. The Public Works Department has staff on-call 24/7.
- The City’s Public Works crew is trained to respond to calls/reports, IC-ID incidents and spill situations. Procedures and specific equipment are utilized to characterize, investigate, respond and eliminate spills, illicit connections or illicit discharges.
- The City reports spills as appropriate to the proper authorities per Phase II NPDES requirements within this program section and the General Conditions G3.
- The City maintains records of requests for services including responses and enforcement actions using the Public Works – Work Orders, iWorQ software system and code enforcement database; Planning Department – Code enforcement and Permit Center software system.
- Staff responsible for source identification and response to spills attend publicized training events or receive internal training as updates are needed. Staff also receive training by attending bimonthly meetings of the Central NPDES Permit Coordinators Forum, which occasionally address IDDE best practices, and by engaging directly with counterparts in neighboring communities to review IDDE policies and procedures.

5.3 Planned Activities

The following table outlines the implementation plan for this year to achieve the goals and objectives of the IDDE Program and meet the compliance deadlines in the Phase II Permit.

Table 5-1 Illicit Discharge Detection and Elimination		
Purpose: Detect, remove and learn from illicit connections, illicit discharges, and improper disposals—including spills—into the MS4.		
Task ID	Task Description	Schedule Notes
IDDE – 1	Continue educating staff, businesses, and the public about hazards associated with illicit discharges/connections and proper procedures for reporting and responding. In 2024, these efforts are expected to include sharing IDDE-related educational content as described in Section 2.3, informing staff about illicit discharges that may occur, and staff trainings to be determined.	Due Date: N/A, Ongoing
IDDE – 2	Evaluate and update, as necessary, ordinance(s) to effectively prohibit non-stormwater discharges.	Due Date: N/A, Ongoing
IDDE – 3	Complete sufficient IDDE field screening of MS4 to maintain an average of 12% of the MS4 inspected each year. Field screenings shall comply with the City’s adopted IC-ID reference manual (see Section 5.2), and the total percentage of the MS4 screened during the reporting period will be determined.	Due Date: December 31, 2024
IDDE – 4	Continue ongoing program for addressing illicit discharges, spills and illicit connections.	Due Date: N/A, Ongoing
IDDE – 5	Continue to maintain records of IDDE activities and report associated data to Ecology as specified in Permit Appendix 12 as part of the annual report.	Due Date: Maintain Records – N/A, Ongoing Submit Data – March 31, 2024
IDDE – 6	Report discharges and spills per IDDE and G3 Notification requirements.	Due Date: N/A, Ongoing
IDDE – 7	Continue training Public Works staff on identification, investigation, termination, cleanup, and reporting of illicit discharges and connections.	Due Date: N/A, Ongoing

5.4 Lead Department and Support

The Public Works Department has the primary responsibility for implementing Illicit Discharge Detection and Elimination activities and receives support from engineering consultants (private companies)..

6. CONTROLLING RUNOFF FROM NEW DEVELOPMENT, REDEVELOPMENT AND CONSTRUCTION SITES

This section describes the permit requirements, programs, and planned activities related to Controlling Runoff from New Development, Redevelopment and Construction Sites.

6.1 Permit Requirements

Section S5.C.6 of the Permit requires the City to:

- Implement and enforce a program to reduce pollutants in stormwater runoff to the City’s MS4 from new development, redevelopment, and construction activities.
- Implement an ordinance or other enforceable mechanism that addresses runoff from new development, redevelopment, and construction site projects.
- Adopt a local program, no later than June 30, 2022, for which the ordinance or other enforceable mechanism includes the minimum requirements, thresholds, definitions (of Appendix 1) or a program approved by Ecology, and inclusive of Appendix 10 for new development. This new program shall apply to all applications submitted on or after July 1, 2022. Or prior to January 1, 2017, that have not started construction by January 1, 2022. Prior to July 1, 2022, that have not started construction by July 1, 2027.
- Exercise a permitting process with site plan review, inspection, and enforcement capability that meets the Phase II Permit standards.
- Make available, as applicable, a link to the electronic *Construction Stormwater General Permit* “Notice of Intent” form for construction activity and, as applicable, a link to the electronic *Industrial Stormwater General Permit* “Notice of Intent” form for industrial activity to representatives of proposed new development and redevelopment and continue to enforce local ordinances controlling runoff from sites that are also covered by stormwater permits issued by Ecology.
- Ensure that all staff whose primary job duties are 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. Provide follow-up training as needed to address changes in procedures, techniques, or staffing and document and maintain records of the training provided and the staff trained.

6.2 Current and Completed Activities

The City has completed or routinely performs the following activities to comply with this Permit section:

- The City originally adopted the King County Surface Water Design Manual (KCSWDM) in 1997 via Ordinance 730. This ordinance established the KCSWDM as the source of minimum requirements, thresholds, and definitions applicable to drainage plan review as set forth in Lake Forest Park Municipal Code chapter 16.24. This City has enacted several ordinances since then modifying this and other LFPMC chapters that reference the LFPMC to maintain compliance with the Permit. The most recent update was enacted via Ordinance 1241. This ordinance modified Lake LFPMC Chapters 16.08, 16.26, 16.24, 16.25, 18.48 and 18.58 to specify the 2021 KCSWDM as the City’s stormwater design manual applicable to regulated development activities. City staff and consultants responsible for plan review continue to ensure compliance with these chapters.
- The City has a system for computerized recordkeeping of site plan review and permitting activities.
- City staff provide plan review of low-intensity development and construction applications, i.e. those that qualify for Simplified Drainage Plan Review per the adopted design manual. The City utilizes a professional civil engineering consultant to provide plan review of more complex applications.
- City staff perform construction inspection and enforcement activities. When staff are overburdened, the City utilizes its engineering consultant to assist with construction inspection and

enforcement activities. Staff/consultants responsible for inspection of development and redevelopment permits are CESCL, LID and IDDE trained. CESCL certification is effective for three years. As needed, re-certification is completed.

- The City has the legal authority for enforcement through Lake Forest Park Municipal Code.
- City makes copies of the “Notice of Intent for Construction Activity” and “Notice of Intent for Industrial Activity” available to developers. The link is available on the City’s Permit Center webpage for Applications and Forms.

6.3 Planned Activities

The following table outlines the implementation plan for this year to achieve the goals and objectives of the program to Control Runoff from New Development, Redevelopment, and Construction Sites and meet the compliance deadlines in the Permit.

Table 6-1 Controlling Runoff from New Development, Redevelopment, and Construction Sites		
Purpose: Establish a program to reduce pollutants in stormwater runoff from new development projects, redevelopment projects, and construction sites. Apply the minimum technical requirements of Appendix 1 of the Phase II Permit (or equivalent).		
Task ID	Task Description	Schedule Notes
CTRL-1	Continue to implement municipal code chapters addressing runoff from new development, redevelopment, and construction site projects including minimum requirements, thresholds and definitions in Appendix 1 of the <i>Stormwater Manual for Western Washington</i> or equivalent.	Due Date: N/A, Ongoing
CTRL-2	Continue to inspect permitted development sites and maintain related records as specified in Permit Section S5.C.6.c.	Due Date: N/A, Ongoing
CTRL-3	Continue to ensure that all staff whose primary job duties are 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.	Due Date: N/A, Ongoing
CTRL-4	Continue to make links to Ecology’s “Notice of Intent for Construction Activity” and “Notice of Intent for Industrial Activity” available to developers.	Due Date: N/A, Ongoing

6.4 Lead Department and Support

The Community Development Department has the lead responsibility for implementing Controlling Runoff from New Development, Redevelopment, and Construction Sites and receives support from the Public Works Department and hired engineering consultant, as needed.

7. MUNICIPAL OPERATIONS AND MAINTENANCE

This section describes the permit requirements, programs, and planned activities related to Municipal Operations and Maintenance.

7.1 Permit Requirements

Section S5.C.7 of the Permit requires the following from the City:

Implement and document an Operations and Maintenance program that regulates maintenance activities, includes a training component, and has the ultimate goal of reducing pollutant runoff from municipal operations.

- Implement maintenance standards that are as protective, or more protective, of facility function than those specified in the *Stormwater Management Manual for Western Washington*. For facilities that do not have maintenance standards, the Permittee shall develop a maintenance standard.
- No later than June 30, 2022 update the maintenance standards as needed to meet the requirements of the Phase II NPDES Permit.
- Verify adequate long-term operations and maintenance of stormwater treatment and flow control BMPs/facilities that are permitted by the City and constructed in accordance with the Phase II NPDES Permit requirements.
- Annual inspection of all regulated and municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities that discharge to the MS4, and taking appropriate maintenance actions in accordance with the adopted maintenance standards.
- Spot checks of potentially damaged permanent stormwater treatment and flow control BMPs/facilities after major storm events (24-hour storm event with a 10-year or greater recurrence interval). If spot checks indicate widespread damage/maintenance needs, inspect all stormwater treatment and flow control BMPs/facilities that may be affected. Conduct repairs or take appropriate maintenance action in accordance with maintenance standards established above, based on the results of the inspections.
- Inspection of all catch basins and inlets owned or operated by the Permittee every 2 years. Clean catch basins if inspection indicates cleaning is needed to comply with maintenance standards. Decant material must be disposed of in accordance with Permit Appendix 6 *Street Waste Disposal*.
- Compliance with the inspection requirements shall be determined by the presence of an established inspection program designed to inspect all sites and achieving at least 95% inspections.
- Implement (and document by December 31, 2022) practices, policies and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the Permittee, and road maintenance activities under the functional control of the Permittee. Lands owned or maintained by the Permittee include, but are not limited to, streets, parking lots, roads, highways, buildings, parks, open space, road rights-of-way, maintenance yards, and stormwater treatment and flow control BMPs/facilities.

- Implement an ongoing training program for employees of the Permittee whose primary construction, operations or maintenance job functions may impact stormwater quality. The training program shall address the importance of protecting water quality, operation and maintenance standards, inspection procedures, selecting appropriate BMPs, ways to perform their job activities to prevent or minimize impacts to water quality, relevant SWPPPs and procedures for reporting water quality concerns. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements, or staffing. Permittees shall document and maintain records of training provided and the staff trained.
- Implement 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 or another NPDES permit that authorizes stormwater discharges associated with the activity. Update as necessary and no later than December 31, 2022.
 - The SWPPP shall include a detailed description of the operational and structural BMPs in use at the facility and a schedule for implementation of additional BMPs. Update the SWPPP as needed.
 - Annual inspections of the facility including visual observation of discharges from the facility to evaluate the effectiveness of the BMPs, identify maintenance needs and determine if additional or different BMPs are needed. Document in an inspection report or checklist.
 - Inventory of the materials and equipment stored on-site, and the activities conducted at the facility, which may be exposed to precipitation or runoff and could result in stormwater pollution.
 - A site map showing the facility's stormwater drainage, discharge points and areas of potential pollutant exposure.
 - A plan for preventing and responding to spills at the facility.
- Maintain records of inspections and maintenance or repair activities conducted by the Permittee.

7.2 Current and Completed Activities

The City has completed or routinely performs the following activities to comply with this Permit section:

- In 2023, the City Department of Public Works (DPW) performed stormwater facility inspection and maintenance per the practices, policies, and procedures (Policies) adopted in 2022. These Policies include:
 - DPW follows the maintenance practices contained in the WSDOT Regional Road Maintenance Program in performing right-of-way-focused maintenance work including cleaning and repair of roadway surfaces, shoulders, and culverts; cleaning closed and open stormwater conveyance; vegetation management, and related tasks. These standards were formally adopted via City Council Resolution 680 in 2002.
 - DPW follows the maintenance standards contained in Appendix A of the 2021 King County Surface Water Design Manual (KCSWDM) with respect to routine maintenance of catch basins and stormwater treatment and flow control facilities/BMPs. In limited

circumstances where the KCSWDM does not include an applicable asset maintenance standard (e.g. proprietary stormwater treatment BMPs), DPW follows the asset manufacturer’s maintenance recommendations.

- DPW follows the maintenance procedural guidance contained in the 2021 King County Stormwater Pollution Prevention Manual in its maintenance of City parking lots, roads, parks, open space, and buildings.
- DPW contracts with King County Water and Land Resource Division (WLRD) to conduct annual inspections and maintenance of municipal flow control and stormwater treatment facilities. WLRD also provides inspections of privately-owned and operated (“commercial”) flow control and stormwater treatment facilities within Lake Forest Park. DPW contracts with a qualified service vendor to perform inspections for sites that have special requirements.
- DPW conducts and documents spot checks of known problem areas following storm events.
- CESCL Certifications are maintained for DPW crew members. Other certification-driven trainings such as Stormwater Inspector Certification are provided as needed and when available. Additionally, the City participates in the Northshore Emergency Management Coalition, which provided monthly safety trainings to DPW staff on subjects including fall prevention, confined space entry, and others relevant to the stormwater program.
- Operation and maintenance activities are documented through the DPW work order database and iWorQ asset management system.
- DPW continually implements a Stormwater Pollution Prevention Plan (SWPPP) for the Public Works Facility which satisfies the requirements of this section. This document was updated in 2022 to reflect the reissuance and City’s adoption of the 2021 King County Stormwater Pollution Prevention Manual and will continue to be updated as necessary.
- Catch basin inspections are performed by King County for City and privately owned facilities. The City works with a qualified service vendor to inspect all other catch basins and inlets on a biannual basis. In 2023, the City completed the required biannual inspection of MS4 catch basins and inlets via contract with Ventilation Power Cleaning.
- Enforcement of long-term operations and maintenance requirements for stormwater facilities are defined under LFPMP 16.24.631-640.

7.3 Planned Activities

The following table outlines the implementation plan for this year to achieve the goals and objectives of the Municipal Operations and Maintenance Program.

Table 7-1 Municipal Operations and Maintenance
Purpose: Implement an operations and maintenance (O&M) program that includes a training component and is designed to prevent or reduce pollutant runoff from municipal operations.

Task ID	Task Description	Schedule Notes
O&M-1	Continue to implement and adhere to the maintenance standards, policies, practices, and procedures described in Section 7.2. Update associated DPW-produced documentation as needed (including for expected permit reissuance requirement of source control of PCBs in cleaning and maintenance of Permittee-owned buildings).	Due Date: N/A, Ongoing
O&M-2	Inspect all City-owned stormwater treatment and flow control facilities and inspect at least 80% of City-regulated stormwater treatment and flow control facilities. Perform maintenance as needed to comply with the maintenance standards.	Due Dates: Inspections: December 31, 2024 Maintenance: varies per facility based on type of maintenance required
O&M-3	Continue inspecting at least 95% of catch basins and inlets owned and operated by the city every 2 years. Perform cleaning and other maintenance as needed to comply with the maintenance standard.	Due Dates: Inspections: August 1, 2025 Cleaning: Within 6 months of structure inspection Other maintenance: Varies per structure based on type of maintenance required.
O&M-4	Update the Public Works Facility Stormwater Pollution Prevention Plan (SWPPP) as needed.	Due Date: N/A, Ongoing.
O&M-5	Continue staff training as needed to serve as “qualified personnel.” Specific training opportunities for 2024 are to be determined.	Due Date: N/A, Ongoing
O&M-6	Continue documentation and tracking in databases and iWorQ software system.	Due Date: N/A, Ongoing

7.4 Lead Department and Support

The Public Works Department has the primary responsibility for implementing municipal operations and maintenance activities and contracts for support from King County WLRD and qualified service vendors.

8. SOURCE CONTROL PROGRAM FOR EXISTING DEVELOPMENT

This section describes the permit requirements, programs and planned activities related to Source Control for Existing Development.

8.1 Permit Requirements

Section S5.C.8 of the Permit requires the following from the City:

Implement a program to prevent and reduce pollutants in runoff from areas that discharge to MS4s:

- Apply as necessary operational and structural source control BMPs and/or treatment BMPs to pollution generating sources.
- Inspection of pollutant generating sources at publicly and privately owned commercial and industrial properties. Enforce implementation of required BMPs to control pollution discharging into the MS4.
- Application and enforcement of local ordinances at businesses and/or properties identified based on the presence of activities that are pollutant generating, reference Permit Appendix 8.
- Practices to reduce polluted runoff from pesticides, herbicides and fertilizers discharging into the MS4.
- By August 1, 2022, adopt an ordinance or other enforceable document(s), requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities, reference Permit Appendix 8.
- By August 1, 2022, establish an inventory that identifies publicly and privately owned commercial and industrial properties which have the potential to generate pollutants to the MS4. Refer to Permit Appendix 8.
- By January 1, 2023, implement an inspection program for sites identified in the established inventory.
 - Provide educational materials about activities that may generate pollutants and source control requirements applicable to those activities.
 - Annually complete inspections equal to 20% of the businesses and/or properties listed in the inventory to assure BMP effectiveness and compliance with source control requirements.
 - Inspect 100% of sites identified through credible complaints (included in 20% inspection rate).
- By January 1, 2023, implement a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable time period, and document enforcement site visits, inspections, warning letters, and notices of violation.
- Train staff who are responsible for implementing the source control program to conduct these activities. Training sessions shall cover: the legal authority for source control, source control BMPs and their proper application, inspection protocols, lessons learned, typical cases and enforcement procedures. Follow-up training must be provided, as needed.
- Document and maintain records of the training provided and staff trained.

8.2 Current and Completed Activities

The City has completed or routinely performs the following activities to comply with this Permit section:

- In 2021, DPW retained an engineering consultant (Parametrix, Inc.) to support the development of required municipal code provisions, draft inventory of regulated sites/businesses, a resourcing plan

for source control program inspections and other operations, and educational and training materials for stakeholders and City inspection resources.

- In 2022, DPW worked with its engineering consultant (Parametrix, Inc.) to establish an inventory that identifies potentially pollutant generating commercial and industrial properties in the City. Draft outreach and educational materials developed for an audience of these property owners were also developed in 2022. Distribution of these materials occurred in 2023 when the inspection program began.
- In 2023, DPW worked with its engineering consultant (Aspect Consulting) to begin a control inspection program that included:
 - Creating an Inspection SOP
 - Creating templates for post-inspection letters
 - Creating a site inspection field sheet
 - Completing a site inventory update
 - Creating an inspection progress tracking spreadsheet
 - Completing 22 initial site visits (no follow-up inspections were needed)
 - Creating 22 post-inspection letters and mailing or emailing them to the business representatives
- DPW staff attended regular meetings of the Business Inspection Group (BIG), a subgroup of the Central NPDES Permit Coordinators Forum, in 2023.

8.3 Planned Activities

The following table outlines the implementation plan for this year to achieve the goals and objectives of the Source Control for Existing Development Program and meet the compliance deadlines in the Permit.

Table 8-1 Source Control Program		
Purpose: Reduce pollutant discharge through inspection, education and BMP implementation		
Task ID	Task Description	Schedule Notes
SC-1	Distribute BMP educational information to owners of inventoried sites of the source control program.	Due Date: N/A, Ongoing
SC-2	Conduct inspections of at least 20% of sites listed on source control program site inventory. Perform follow-up inspections and implement progressive enforcement procedures as needed to ensure compliance with program requirements. Document site visits and the outcome of inspections and follow-ups.	Due Date: December 31, 2024
SC-3	Continue to train and otherwise prepare inspection resource staff as needed.	Due Date: N/A, Ongoing
SC-4	Update source control site inventory.	Due Date: December 31, 2024

SC-5	As needed, enforce Source Control Ordinance and implement Progressive Enforcement policy.	Due Date: N/A, Ongoing
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8.4 Lead Department and Support

The Public Works Department has the primary responsibility for implementing Source Control Program for existing development and receives support from engineering consultants.

S7. COMPLIANCE WITH TOTAL MAXIMUM DAILY LOAD REQUIREMENTS

Currently, there are no Phase II NPDES Permit driven nutrient load limit restrictions on waterways within Lake Forest Park jurisdiction. Therefore, the requirements and conditions of S7- Compliance with Total Maximum Daily Load Requirements, do not apply.

S8. MONITORING AND ASSESSMENT

This section describes the permit requirements and planned activities related to water quality monitoring.

S8.1 Permit Requirements

Section S8 of the Permit requires the following from the City:

Regional Status and Trends Monitoring:

- Option #1 – Pay into the collective fund to implement regional small streams and marine nearshore areas status and trends monitoring in Puget Sound.
- Option #2 – Conduct stormwater discharge monitoring per the Phase II Permit requirements identified in section S8.C.
- By December 1, 2019, notify Ecology in writing which of the above options for Regional Status and Trends Monitoring the City will chose to carry out for the duration of the 2019-2024 Phase II Permit cycle.

Stormwater management program (SWMP) effectiveness and source identification studies:

- Option #1 – Pay into the collective fund to implement effectiveness studies and source identification studies.
- Option #2 – Conduct stormwater discharge monitoring per the Phase II Permit requirements identified in section S8.C.

- By December 1, 2019, notify Ecology in writing, which of the above options for effectiveness studies and source identification studies the City will chose to carry out for the duration of the 2019-2024 Phase II Permit cycle.
 - Submit records of SWMP activities tracked and/or maintained in accordance with S5 and/or S9 in response to requests from the Stormwater Action Monitoring (SAM) Coordinator for information associated with effectiveness and source identification studies that are under active SAM contracts.

S8.2 Current and Completed Activities

The City currently pays into the collective funds supporting the three categories of the Stormwater Action Monitoring (SAM) program.

On October 17, 2019, the City submitted a letter notifying Ecology of the City's intentions to pay into the collective funds of the regional Status and Trends Monitoring (Option #1) as well as SWMP Effectiveness and Source Identification studies (Option #1) and implement the SAM program. The City elected to pay into the regional Status and Trends Monitoring (\$2,149) and Effectiveness and Source Identification studies (\$3,927) collective funds to implement the SAM program.

The City of Lake Forest Park also engages in a volunteer stream monitoring project performed by the Lake Forest Park StreamKeepers. The StreamKeepers are a volunteer group that track water quality of Lake Forest Parks local streams: Lyon Creek and McAleer Creek. Once a month they conduct water quality testing at specific sample locations. They use this testing and data to educate the public of the health of Lake Forest Park's streams and watershed. The group collects data including turbidity, pH and dissolved oxygen, and Benthic Index of Biological Integrity (BIBI). The City of Lake Forest Park provided \$2,500 in 2009 to fund the new monitoring equipment for testing and has since purchased refill kits (approx. \$700) each year.

S8.3 Planned Activities

The following table outlines the implementation plan for this year to achieve the goals and objectives of the Monitoring and Assessment Program.

Table S8-1 Monitoring and Assessment		
Purpose: Long-term monitoring.		
Applicability: Regional effort supporting monitoring in Lake Forest Park and around Puget Sound.		
Task ID	Task Description	Schedule Notes
M-1	Continue to support LFP Streamkeepers in their monitoring of priority water bodies in Lake Forest Park.	Due Date: N/A, Ongoing

M-2	It is anticipated that LFP will pay into collective funds for regional monitoring under new permit	Due Date: December 1, 2024.
M-3	It is anticipated that LFP will be required to notify Ecology in writing on which of the above options for effectiveness studies and source identification studies the City will choose to carry out for the duration of the 2024-2029 Phase II Permit cycle.	Due Date: December 1, 2024

S8.4 Lead Department and Support

The Public Works Department has the primary responsibility for implementing monitoring and assessment.

S9. REPORTING REQUIREMENTS

This section describes the permit requirements and planned activities related to reporting.

S9.1 Permit Requirements

Section S9 of the Permit requires the following of the City:

- No later than March 31 of each year beginning in 2020, each Permittee shall submit an annual report. The reporting period for the annual report will be the previous calendar year unless otherwise specified. The annual report shall include:
 - A copy of the SWMP.
 - Submittal of the annual report form as provided by Ecology.
 - Attachments to the annual report form including summaries, descriptions, reports and other information as required.
 - If applicable, notice that the MS4 is relying on another governmental entity to satisfy any of the obligations under this permit.
 - Notification of any annexations or jurisdictional boundary changes.
 - Certification and signature pursuant to G19D.
- Keep all records related to this permit and the SWMP for at least 5 years.
- Make all records related to this permit and the Permittee's SWMP available to the public at reasonable times during business hours. The Permittee will provide a copy of the most recent annual report to any individual or entity, upon request.

S9.2 Current and Completed Activities

The City maintains electronic files for Phase II NPDES requirements. Information is tracked through independent software systems and program files.

S9.3 Planned Activities

The following table outlines the implementation plan for this year to achieve the goals and objectives of the Reporting Program meet the compliance deadlines in the Permit. Planned activity PI-2 in Table 3-1 addresses the requirement for public availability of SWMP related documents.

Table S9-1 Reporting		
Purpose: Document SWMP activities and submit annual reports to Ecology.		
Applicability: All City stormwater program activities related to Phase II Permit compliance.		
Task ID	Task Description	Schedule Notes
RPT-1	Prepare 2023 Annual Report and 2024 SWMP Plan.	Due date: March 31, 2024
RPT-2	Continue to maintain records of SWMP and permit activities for the five-year duration, as required.	Due Date: N/A, Ongoing

S9.4 Lead Department and Support

The Public Works Department has the primary responsibility for implementing reporting.

CONCLUSION

This SWMP has been prepared to demonstrate compliance with the requirements of the Permit. The implementation tables indicate planned activities as of January 1, 2024. This SWMP is a living document that will be updated annually to reflect progress with implementing the stormwater management program components required for compliance with the Permit.