

*This 2025 SWMP Plan is required by the Department of Ecology for
NPDES Phase II Western Washington Municipal Stormwater Permit Compliance*

2025 Stormwater Management Program Plan for

City of Lake Forest Park



March 31, 2025

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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). The Washington State Department of Ecology (Ecology) administers the Permit on behalf of the United States Environmental Protection Agency (EPA). Ecology updates and reissues the Permit approximately once every 5 years. The Permit was first issued in 2007; the current/active Permit term began in August of 2024 and will conclude in July of 2029.

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 others. 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.

This SWMP 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 includes the following typical subsections:

1. Permit Requirements

- This subsection 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 subsection 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 subsection 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

- This subsection includes descriptions of which resources the City intends to use 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 subsection.

I. STORMWATER PLANNING

1.1 Permit Requirements

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

- Continue to convene an interdisciplinary team to inform and assist in the development, progress, and influence of the comprehensive stormwater planning program.
- Describe how stormwater management needs and protection/improvement of receiving water health are (or are not) informing the long-range or comprehensive planning update processes and influencing policies and implementation strategies in their jurisdiction in the Annual Report due March 31, 2027.
- 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 documenting the measures developed to address said barriers.
- No later than December 31, 2028, adopt and implement tree canopy goals and policies to support stormwater management. Permittees shall consider how existing or future tree canopy can support stormwater management and water quality improvements in receiving waters. Establish a long-term (e.g., 5-, 10-year, or longer) goal of canopy, existing or future projection, to be used for stormwater management that is appropriate to the jurisdiction. Specific considerations for canopy for stormwater management on Permittee-owned or operated lands shall include (but are not limited to)
 - maintaining or increasing canopy in overburdened communities, and
 - maintaining existing mature canopy.

Permittees shall document considerations, reasoning, and rationale for goals and policies.

- Develop a Stormwater Management Action Plan (SMAP) by following a similar process and considering the range of issues outlined in Ecology's 2024 *Stormwater Management Action Planning Guidance* document (Publication 24-10-027) for one new priority catchment or additional actions for an existing SMAP. By March 31, 2027, Permittees shall complete the following:
 - A SMAP for at least one new priority catchment area or additional actions for an existing SMAP that includes:
 - A description of the stormwater facility retrofits needed for the area, including BMP types and preferred locations. Include projects that address transportation-related runoff, such as projects that address tire wear runoff.
 - Land management/development strategies and/or actions identified for water quality management.

- Focused, enhanced, or customized implementation of stormwater management program actions (e.g., illicit discharge detection and elimination [IDDE] field screening, prioritization of Source Control inspections, Operations and Maintenance (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 6 years), and Long-term actions (i.e., actions to be accomplished within 7 to 20 years).
- Actions in the SMAP that may benefit overburdened communities, including specifically vulnerable populations and highly impacted communities.
- 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 interdisciplinary team to inform the stormwater planning program and held a kickoff meeting. The interdisciplinary team includes staff from the City's Planning, Public Works, Community Development, 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 interdisciplinary team across a range of stormwater planning activities. The City also contracts with PACE Engineers, Inc. and FLO Analytics for stormwater support.
- The City's 2020 Annual Report to Ecology described the City's recent long-range planning efforts undertaken during the previous Permit term along with stormwater management capital projects and other measures that resulted therefrom. This report is available for review upon 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.

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.		
Applicability: Applies to Planning, Public Works, Engineering, and other City staff and stakeholders to the planning process, including the general public and elected officials.		
Task ID	Task Description	Schedule Notes
SP-1	Initiate implementation of the short-term stormwater management actions included in the SMAP. These actions have yet to be determined, but will be completed within the first 6 years of the SMAP's 20-year total implementation time frame.	Due date: March 31, 2029
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 (DPW) has the primary responsibility for implementing Stormwater Planning activities.

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 City to provide an education and outreach program. The program shall be designed to:

- Educate priority 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 priority audience and one subject area and provide information on an ongoing or strategic schedule.

- Effect behavior change to reduce or eliminate behaviors and practices that cause or contribute to stormwater impacts.
 - Select one priority audience and one BMP for the behavior management campaign.
 - Based on the effectiveness evaluation, follow and apply social marketing practices and methods and develop, no later than July 1, 2025, a behavior change program that is tailored to the community and inclusive of an evaluation plan.
 - Implement the behavior change campaign by September 1, 2025.
 - By March 31, 2029, evaluate and submit report on results and any planned or recommended changes to behavior change campaign.
 - In an adaptive management format, continue to update, evaluate, and 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 has several informal and formal programs. Current efforts have included the following activities:

- Volunteer storm drain labeling program.
- Articles posted on the City's website Newsflash's, Facebook, Twitter, Instagram, and Nextdoor. The posts include information on 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.
- Booths 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) 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.
- Participation in the Lake Ballinger/McAleer Creek Forum that holds regular public meetings to discuss a basin-wide strategic action plan to addresses water quality and quantity.
- Materials distributed at City Hall, public meetings, staff meetings, planning and building 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 carried by DPW crew members in their vehicles to distribute to residents in need or for use by DPW 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 in September.
- Stormwater education messages inserted in the quarterly City Newsletter and monthly eNews.
- Natural Yard Care education supported by the City to educate residents on better yard care practices and stormwater awareness at the City’s Green Fair.
- The City 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 2024 Annual NPDES Report.
- The City is in process of developing a behavior change campaign and will begin implementing the campaign by September 1, 2025.
- The City supports forest restoration work parties led by the local Lake Forest Park 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 priority audiences about the stormwater problem and provide specific actions they can follow to minimize the problem.

Applicability: Prioritize the general public, businesses, homeowners, engineers, contractors and developers, review staff, land use planners, residents, landscapers, property managers, and schools.

Task ID	Task Description	Schedule Notes
EDUC-1	<p>Puget Sound Starts Here Month – General Awareness The City will support Puget Sound Starts Here Month in 2025. 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.</p>	Due Date: September 2025
EDUC-2	<p>Storm Drain Labeling Challenge – Stewardship Opportunities The City will continue to challenge the community to label storm drains throughout Lake Forest Park.</p>	Due Date: N/A, Ongoing
EDUC-3	<p>City Quarterly Newsletters and Monthly eNews – General Awareness/Stewardship Opportunities The City will distribute stormwater education articles with City quarterly newsletters and monthly eNews.</p>	Due Date: N/A, Ongoing
EDUC-4	<p>Distribute educational videos through the City’s local TV Channel – General Awareness 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.</p>	Due Date: N/A, Ongoing
EDUC-5	<p>Regional and Local Coordination – General Awareness 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.</p>	Due Date: Ongoing
EDUC-6	<p>The City will develop a campaign tailored to the community including development of a program evaluation plan. – Behavior Change Program</p>	Due Date: July 1, 2025
EDUC-7	<p>Implement Behavior Change Campaign – Behavior Change Program</p>	Due Date: September 1, 2025

2.4 Lead Department and Support

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

3. PUBLIC INVOLVEMENT AND PARTICIPATION

This section describes the Permit requirements along with 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.
 - Annually, Permittees shall document specific public involvement and participation opportunities provided to overburdened communities.
 - No later than December 31, 2026, document methods used to identify overburdened communities.
- 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 activities in this area include the following:

- 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, and City sponsored or attended community partner events provide opportunities for public involvement and education.
- A Request for Service form is available on the City's website along with City staff email addresses to submit comments or concerns.
- The Annual Report is posted on the City's webpage:

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 SMAP and SWMP.

Applicability: Applies to general public, advisory council, and watershed committees.

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 hybrid with in-person and virtual attendance options. 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, 2025
PI-2	Post the SWMP, Annual Report, and any other documents related to stormwater permit on the City's website.	Due date: May 31, 2025
PI-3	Continue providing routine opportunities for the public to submit comments or concerns related to the City's stormwater programs, as described in Section 3.2.	Due Date: N/A, Ongoing
PI-4	Describe specific public involvement opportunities provided to overburdened communities.	Due date: March 31, 2025

3.4 Lead Department and Support

The DPW 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 MS4 mapping and documentation.

4.1 Permit Requirements

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

- Perform ongoing mapping and documentation of the MS4. Elements include:
 - Known MS4 Outfalls or discharge points, also noting 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, documenting conveyance type, material, and size (where known), along with 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.
 - All known connections from the MS4 to a privately owned stormwater system.
- Develop new mapping on the following timeline:
 - No later than March 31, 2026, Permittees shall submit locations of all known MS4 outfalls according to the standard templates and format provided in the Annual Report. This reporting shall include the size and material of the outfalls.
 - No later than December 31, 2026, using available, existing data, map tree canopy to support stormwater management on Permittee-owned or operated properties. Permittees shall develop and follow a methodology to intentionally identify canopy for stormwater management purposes, which may be updated annually or as needed.
 - No later than March 31, 2028, 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 Permittee. Submit with the March 31, 2028 Annual Report a map(s) (PDF) and table (Microsoft Excel) 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 Permittee.
- No later than December 31, 2028, using available, existing data, map overburdened communities in relation to stormwater treatment and flow control BMPs/facilities, outfalls, discharge points, and tree canopy on Permittee-owned or operated properties.
- To the extent consistent with national security laws and directives, each Permittee shall make available to Ecology, upon request, available maps depicting the information required in S5.C.4.a-c of the Permit.
- Upon request, and to the extent appropriate, Permittees shall provide mapping information to federally recognized Indian Tribes, municipalities, and other Permittees. The Permit does not preclude Permittees from recovering reasonable costs associated with fulfilling mapping information requests.

4.2 Current and Completed Activities

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

- Developed an inventory of its MS4 assets and an associated GIS map in 2010.
- 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.
- 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.).
- 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.		
Applicability: Applies to City staff and general public.		
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

4.4 Lead Department and Support

The 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 consultant to assist with MS4 mapping updates and 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 prohibit, prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the MS4. This program should 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 shall be identified through, 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 employees, 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 MS4 to the maximum extent allowable under state and federal law. The Permittee's ordinance or other regulatory mechanism in effect as of the effective date of this Permit shall be revised, if necessary, to meet the requirements of this Permit section no later than July 1, 2027.
- Implement an ongoing program designed to detect and identify illicit connections and non-stormwater discharges into the City's MS4. This program should:
 - Develop 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 percent of the MS4 each year.
 - 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. 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). The program shall include:
 - Procedures for characterizing the nature of, and potential public or environmental threat posed by, any illicit discharge found by or reported to the Permittee.
 - Procedures for the post-emergency clean-up of firefighting activities:
 - No later than December 31, 2026, the Permittee shall coordinate with firefighting agencies/departments that serve the areas that discharge to the MS4 to be notified when PFAS-containing aqueous film forming foams (AFFF) are used during emergency firefighting activities.
 - No later than January 1, 2027, Permittee shall update and implement procedures to minimize discharges to the MS4 during post-emergency cleanup and disposal activities including, but not limited to, the immediate cleanup in all situations where PFAS-containing AFFFs have been used; diversions; and other measures that prevent discharges to the MS4. The Permittee is not expected to deploy control measures during an emergency.
 - Procedures for tracing the source of an illicit discharge.
 - Procedures for eliminating the discharge, including notification of and 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 as specified in Permit Appendix 13 as a part of the Annual Report. Permittees can choose to use Ecology's WQWebIDDE form or a tracking system developed by the Permittee that meets the reporting data and format requirements.

5.2 Current and Completed Activities

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

- Adopted Lake Forest Park Municipal Code (LFPMC) Chapter 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.

- Continues the City's Public Education Program to inform 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.
- Performing field screening annually (typically at outfalls) and following the guidelines of the IC-ID Field Screening and Source Tracing Guidance Manual. In 2024, 12 percent of the MS4 was screened at the outfalls based on conveyance length associated with each outfall structure.
- Operating 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 DPW. After-hours calls are processed by King County (dispatch) through an interlocal agreement. Calls are recorded and logged as action requests electronically. DPW has staff on-call 24/7.
- Trains DPW crew to respond to calls/reports, IC-ID incidents, and spill situations. Procedures and specific equipment are used to characterize, investigate, respond to, and eliminate spills, illicit connections, or illicit discharges.
- Reports spills as appropriate to the proper authorities per Phase II NPDES requirements within this program section and General Condition G3.
- 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.
- Require staff responsible for source identification and response to spills to attend publicized training events or receive internal training as updates are needed. In 2024, staff received training by attending meetings of the Central NPDES Coordinators among numerous other regional NPDES groups, which occasionally address IDDE best practices, by attending CESCL certification training, and by engaging directly with counterparts in neighboring communities (e.g., City of Kirkland) to review IDDE code provisions.

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 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.

Applicability: Applies to the City's municipal separate storm sewer system (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 2025, 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 percent of the MS4 inspected annually. 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, 2025
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, 2025
IDDE – 6	Report discharges and spills per IDDE and G3 Notification requirements.	Due Date: N/A, Ongoing
IDDE – 7	Continue training DPW 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 DPW has the primary responsibility for implementing Illicit Discharge Detection and Elimination activities.

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, 2027, 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: (a) on or after July 1, 2027; (b) prior to January 1, 2017, that have not started construction by July 1, 2022; (c) prior to July 1, 2022, that have not started construction by July 1, 2027; and (d) prior to July 1, 2027, that have not started construction by July 1, 2032.
- Exercise a permitting process with site plan review, inspection, and enforcement capability that meets the Permit standards, applies to both private and public projects that meet the minimum thresholds, and uses qualified personnel.
- Make available to representatives of proposed new development and redevelopment, as applicable: (a) a link to the electronic *Construction Stormwater General Permit* "Notice of Intent" form for construction activity, (b) a link to the electronic *Industrial Stormwater General Permit* "Notice of Intent" form for industrial activity, and (c) a link to the online registration requirements for Underground Injection Control (UIC) wells. Permittees shall 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. 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 LFPMC Chapter 16.24. Since then, the City has enacted several ordinances 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 (July 2022). This ordinance modified 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 LFPMC 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 uses 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 relies on 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 3 years, and Re-certification is completed as needed.
- The City has the legal authority for enforcement through the LFPMC.
- 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

<p>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 Permit Appendix 1 (or equivalent).</p>		
<p>Applicability: All new development, redevelopment, and construction sites that meet conditions requiring drainage review per the King County Surface Water Design Manual.</p>		
Task ID	Task Description	Schedule Notes
CTRL-1	Continue to implement LFPMC chapters addressing runoff from new development, redevelopment, and construction site projects, including minimum requirements, thresholds, and definitions in Appendix 1 of the <i>Stormwater Management 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 Planning and Building Department has the lead responsibility for implementing Controlling Runoff from New Development, Redevelopment, and Construction Sites, with assistance from the DPW and the City's engineering consultant, as needed.

7. STORMWATER MANAGEMENT FOR EXISTING DEVELOPMENT

This section describes the permit requirements, programs, and planned activities related to stormwater management for existing development (SMED)

7.1 Permit Requirements

Section S5.C.7 of the Permit requires the City to 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 time frames. This Permit section requires the City to:

- Implement stormwater facility retrofits, or tailored SWMP actions, that meet criteria described in Permit Appendix 12, using one or a combination of the following:
 - Strategic stormwater investments identified in the SMAP or similar stormwater planning process; and/or
 - Opportunistic stormwater investments identified by leveraging projects outside of SMAP areas to improve stormwater management and infrastructure.
- Include in each Annual Report a list of planned, individual projects scheduled for funding or implementation during the Permit term for the purpose of meeting the assigned equivalent acreage following information and formatting specified in Appendix 12. The City's has been assigned an equivalent acreage of 2.2 acres for this Permit term.
- No later than March 31, 2028, Permittees shall fully fund, start construction, or completely implement projects that meet the assigned equivalent acreage and submit documentation with the Annual Report (due March 31, 2028) as described in Permit Appendix 12.
- Permittees shall report the amount of estimated or projected equivalent acres managed by stormwater facility retrofits for the next Permit term (i.e., 2029-32). The report shall be submitted to Ecology no later than March 31, 2028.

7.1 Current and Completed Activities

The City is working toward identifying potential projects to satisfy this new Permit requirement.

7.2 Planned Activities

The following table outlines the implementation plan for this year to achieve the goals and objectives Stormwater Management for Existing Development Sites and meet the compliance deadlines in the Permit.

Table 7-1
Stormwater Management for Existing Development

Purpose: Establish a program to control or reduce discharges to waters of the State from areas of existing development. Apply the minimum technical requirements of S5.C.7 of the Phase II Permit (or equivalent).		
Applicability: Strategic stormwater investments over longer planning time frames for existing development.		
Task ID	Task Description	Schedule Notes
SMED-1	Provide a list of planned, individual projects scheduled for funding or implementation during this Permit term for the purpose of meeting the City's assigned equivalent acreage (2.2 acres) following information and formatting specified in Permit Appendix 12.	Due Date: March 31, 2025
SMED-2	Provide a summary of the estimated or projected equivalent acres to be managed by stormwater facility retrofits under the next Permit term.	Due Date: March 31, 2028

7.3 Lead Department and Support

The DPW has the primary responsibility for implementing stormwater management for existing development.

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 City implement a program to prevent and reduce pollutants in runoff from areas that discharge to MS4s. This requires the following:

- Apply operational and structural source control BMPs and/or treatment BMPs to pollution generating sources, as necessary.
- Inspect pollutant-generating sources at publicly and privately owned commercial and industrial properties. Enforce implementation of required BMPs to control pollution discharging into the MS4.
- Apply and enforce local ordinances at businesses and/or properties identified based on the presence of activities that are pollutant generating, reference Permit Appendix 8.
- Enact practices to reduce polluted runoff from pesticides, herbicides, and fertilizers discharging into the MS4.
- By August 1, 2027, update and make effective 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 (refer to Permit Appendix 8).
- 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). The inventory is to be updated at least once every 5 years.
- Implement an inspection program for sites identified in the established inventory. The program shall:
 - Provide educational materials about activities that may generate pollutants and source control requirements applicable to those activities.
 - Annually complete inspections equal to 20 percent of the businesses and/or properties listed in the inventory to assure BMP effectiveness and compliance with source control requirements.
 - Inspect 100 percent of sites identified through credible complaints (included in 20 percent inspection rate).

- 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 to support the development of (a) required municipal code provisions, (b) a draft inventory of regulated sites/businesses, (c) a resourcing plan for source control program inspections and other operations, and (d) educational and training materials for stakeholders as well as City inspection resources.
- In 2022, DPW worked with its engineering consultant to (a) establish an inventory that identifies potentially pollutant-generating commercial and industrial properties in the City, and (b) develop draft outreach and educational materials for property owners. Distribution of these materials occurred in 2023 when the source control inspection program was initiated.
- In 2023 and 2024, DPW worked with its engineering consultant to start a source control inspection program that included
 - preparing a Source Control Inspection SOP,
 - creating templates for post-inspection letters,
 - preparing a site inspection field sheet,
 - updating the existing site inventory,
 - creating a source control inspection progress tracking spreadsheet,
 - completing 25 initial site visits in 2024 (three follow-up inspections were needed), and
 - creating 25 post-inspection letters and mailing or emailing them to the business representatives.
- Inspections are being completed by trained consultant staff under contract with the City.
- Update site inventory that was previously established (once per permit cycle).

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

<p>Purpose: Reduce pollutant discharge through inspection, education, and BMP implementation</p>		
<p>Applicability: Pollutant-generating properties as characterized in the Permit</p>		
Task ID	Task Description	Schedule Notes
SC-1	Distribute BMP educational information to owners of sites inventoried as part of the Source Control program.	Due Date: N/A, Ongoing
SC-2	Conduct inspections of at least 20 percent 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, 2025
SC-3	Continue to train and otherwise prepare inspection resource staff as needed. Specific training opportunities are to be determined.	Due Date: N/A, Ongoing
SC-4	As needed, enforce Source Control Ordinance and implement Progressive Enforcement policy.	Due Date: N/A, Ongoing

8.4 Lead Department and Support

The DPW has the primary responsibility for implementing Source Control Program for existing development. The City contracted with a trained consultant to perform all source control inspections.

9. MUNICIPAL OPERATIONS AND MAINTENANCE

This section describes the permit requirements, programs, and planned activities related to municipal operations and maintenance.

9.1 Permit Requirements

Section S5.C.9 of the Permit requires the City to implement and document an operations and maintenance (O&M) program that regulates maintenance activities, includes a training component, and has the ultimate goal of reducing pollutant runoff from municipal operations. The O&M program requires the City to:

- 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, 2027, update the maintenance standards as needed to meet the requirements of the 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 Permit requirements.
- Conduct annual inspection of all regulated and municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities that discharge to the MS4, and take appropriate maintenance actions in accordance with the adopted maintenance standards.
- Conduct 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 needed repairs or take appropriate maintenance action in accordance with maintenance standards established above (first bullet in this section) based on the results of the inspections.
- Inspect 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.
- Determine compliance with the inspection requirements by the presence of an established inspection program designed to inspect all sites and achieving at least 95 percent inspections.
- Implement (and document by December 31, 2027) 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.
 - For Permittee-owned buildings built or renovated between 1950 and 1980, update policies, practices, or procedures to include Source Control BMPs to minimize PCBs from entering the MS4. Permittees shall not discharge washdown water to the MS4 if the building is confirmed or suspected to have PCB containing materials.
 - 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.
- Develop and implement 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 by July 1, 2027. The following program elements shall be included:
 - Apply street sweeping program to priority areas such as- curbed municipal streets that discharge to outfalls and are high traffic streets or streets that serve commercial or industrial land use areas.
 - Sweep priority areas at least once between July and September each year and at least two additional times a year as determined by the Permittee to provide additional water quality benefits. For calendar year 2027, only one sweeping event is required between July and December.

- Compliance will be determined by records of a sweeping program designed to sweep all priority areas identified and sweeping at least 90 percent of priority areas each sweeping event.
 - Alternative sweeping timing and frequency based on local conditions and estimated pollutant deposition quantities may be documented based on actual maintenance experience and be certified in accordance with General Condition G19.
- Develop 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.
- Disposal of sweeper waste material in accordance with Permit Appendix 6 – Street Waste Disposal.
- Submit with Annual Report the following information about the priority areas starting March 31, 2028:
 - Priority areas swept identified on a map
 - Sweeping dates
 - 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
- Implement an ongoing training program for employees 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, street sweeper operation, ways to perform their job activities to prevent or minimize impacts to water quality, relevant Stormwater Pollution Prevention Plans, 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.
 - 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.
 - Conduct 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.

- Take 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.

9.2 Current and Completed Activities

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

- In 2024, DPW performed stormwater facility inspection and maintenance per the practices, policies, and procedures adopted in 2022.
 - DPW follows the maintenance practices contained in the Washington State Department of Transportation (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 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 partners with King County Water Land and Resource Division to conduct annual inspections and maintenance of municipal flow control and stormwater treatment facilities. King County also provides inspections of privately-owned and operated ("commercial") flow control and stormwater treatment facilities within Lake Forest Park. DPW has hired a consultant 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 SWPPP for the Public Works Facility. 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 vendor to inspect all other catch basins on a biannual basis.
- Enforcement of long-term operations and maintenance requirements for stormwater facilities are defined under LFPMC 16.24.631-640.

9.3 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 9-1 Municipal Operations and Maintenance		
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 9.2. Update associated DPW-produced documentation as needed to include PCB source control requirements for 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 percent of City-regulated stormwater treatment and flow control facilities. Perform maintenance as needed to comply with the maintenance standards.	Due Dates: Inspections: December 31, 2025 Maintenance: Varies per facility based on type of maintenance required
O&M-3	Continue inspecting at least 95 percent 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: December 31, 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 2025 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
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9.4 Lead Department and Support

The DPW has the primary responsibility for implementing municipal operations and maintenance activities.

S7. COMPLIANCE WITH TOTAL MAXIMUM DAILY LOAD REQUIREMENTS

Currently, there are no Permit-driven nutrient load limit restrictions on waterways within the City's 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 Permit requirements identified in Section S8.C.
- By December 1, 2024, 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 2025-2029 Permit term.

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, 2024, notify Ecology in writing which of the above options for SWMP Effectiveness and Source Identification studies the City will choose to carry out for the duration of the 2025-2029 Permit term.
 - 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 SWMP 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 November 27, 2024, 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 (\$3,405) and Effectiveness and Source Identification studies (\$5,039) collective funds to implement the SAM program.

The City 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 Park's local streams, including Lyon and McAleer Creeks. 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 Inventory 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	LFP will pay into collective funds for regional monitoring under the 2024-29 Permit.	Due Date: August 15, 2025.

S8.4 Lead Department and Support

The DPW has the primary responsibility for implementing monitoring.

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 2025, 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;
 - the 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; and
 - certification and signature pursuant to General Condition G19.D.
- Maintain all records related to the Permit and the SWMP for at least 5 years.
- Make all records related to the 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 NPDES Phase II Permit 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 to 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 NPDES Phase II Permit compliance.

Task ID	Task Description	Schedule Notes
RPT-1	Prepare 2024 Annual Report and 2025 SWMP Plan.	Due date: March 31, 2025
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 DPW has the primary responsibility for implementing reporting.

CONCLUSION

This SWMP Plan has been prepared to demonstrate compliance with the requirements of the Permit. The implementation tables indicate planned activities as of January 1, 2025. This SWMP is a living document that will be updated annually to reflect progress with implementing the City Stormwater Management Program components required for compliance with the Permit.