

This 2022 SWMP Plan is required by the Department of Ecology for

Phase II NPDES Municipal Stormwater Permit Compliance

2022 Stormwater Management Program Plan for

City of Lake Forest Park



March 31, 2022

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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 endeavors 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 outlining 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

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 (www.cityofflp.com) and available for the public’s review at City Hall.

- This sub-section includes descriptions of compliance efforts the City specifically plans to undertake and/or complete in the forthcoming year.
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 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.
- 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 on the City website (www.cityofflp.com/181/Environmental-Programs).
- 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	<p>Initiate and complete the first phase of SMAP development work (Receiving Water Assessment), which includes:</p> <ul style="list-style-type: none">• Hold a kickoff meeting with the consultant and the Interdisciplinary Team• Develop the Receiving Water Assessment report and submit to Ecology. This report shall include an analysis of Public Health conditions relevant to stormwater management in the City’s receiving water basins, among other analyses of receiving water .• Develop a public outreach and engagement plan. Appropriate efforts to engage overburdened communities will be identified in the plan based on the results of the Public Health assessment described above.	Due date: March 31, 2022
SP-2	<p>Initiate and complete the second phase (Receiving Water Prioritization) of SMAP development work, which includes:</p> <ul style="list-style-type: none">• Share the results of the Receiving Water Assessment with stakeholders and solicit their feedback regarding the prioritization method.• Develop the prioritization method and apply it to eligible receiving waters to develop a ranked list of receiving waters.• Select a high-priority basin(s) from the ranked list for inclusion in the SMAP.	Due date: March 31, 2022

<p>SP-3</p>	<p>Begin development of the SMAP. This work will include the following tasks, some or all of which may not be completed in 2022:</p> <ul style="list-style-type: none"> • Identify action opportunities within required categories (e.g. facility retrofits, targeted SWMP activities, etc.) whose implementation is practicable within the short and long-term time horizons for the plan. • Working collaboratively with stakeholders, select actions for inclusion in the draft SMAP and define their associated implementation requirements, e.g. cost and funding sources, schedule, etc. • Write the draft SMAP report and initiate the process of stakeholder review and acceptance. 	<p>Due date: March 31, 2023</p>
<p>SP-4</p>	<p>Continue implementing the routine activities related to LID code application and barrier elimination described in Section 1.2.</p>	<p>Due date: N/A, ongoing.</p>

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 City has chosen to address closing and keep closed dumpster lids as the behavior change campaign. 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 1 target audience and 1 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 1 target audience and 1 Best Management Practice (BMP).
 - 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.
 - Evaluate the effectiveness of the on-going 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 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
- Periodic partnership with Adopt-a-Stream program dedicated to stream habitat restoration projects
- 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 (<http://www.cityoflfp.com/index.aspx?NID=180>)
- 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 (<http://www.cityofmlt.com/488/Lake-BallingerMcAleer-Creek-Watershed-Fo>)
- Materials are 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 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, also sent to City Staff
- 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
- In 2020 and 2021, Lake Forest Park joined in with regional partners to support outreach for management of solid waste dumpsters at commercial waste areas. A pilot program of commercial dumpster awareness was developed and deployed in 2021. Staff actively engaged in the development of the campaign by participating in the Dumpster Summit, local SOGgies meetings, collating data, and supporting the development of the strategy and schedule for the campaign. During the pilot program, a commercial property owner received educational literature and communication from City staff regarding the water quality benefits of keeping solid waste dumpster lids properly closed. The City determined that the educational effort helped inspire a meaningful performance improvement. Additional details are provided with the City’s 2021 Annual NPDES Report.
- The City has partnered with KCD in providing a Restoration Stewardship program that will focus on education and forest 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.		
Applicability: Target 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	Puget Sound Starts Here Month. The City will support Puget Sound Starts Here Month in 2022. 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 2022

<p>EDUC-2</p>	<p>Storm Drain Labeling Challenge.</p> <p>The City will continue to challenge the Youth Council and community to label storm drains throughout Lake Forest Park.</p>	<p>Due Date: N/A, Ongoing</p>
<p>EDUC-3</p>	<p>City Quarterly Newsletters and Monthly eNews.</p> <p>The City will distribute stormwater education articles with City quarterly newsletters and monthly eNews</p>	<p>Due Date: N/A, Ongoing</p>
<p>EDUC-4</p>	<p>Distribute educational videos through the City’s local TV Channel.</p> <p>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>	<p>Due Date: N/A, Ongoing</p>
<p>EDUC-5</p>	<p>Natural Yard Care Promotion</p> <p>The City will host and/or support natural yard care workshop to educate homeowners on best management practices towards behavior changes while providing education/training. New Forest Restoration Stewardship program will continue through 2022.</p>	<p>Due Date: N/A, Ongoing</p>
<p>EDUC-6</p>	<p>Regional and Local Coordination</p> <p>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, the dumpster lid campaign outreach, and other ideas/options will be looked at.</p>	<p>Due Date: N/A, Ongoing</p>
<p>EDUC-7</p>	<p>Behavior Change Program</p> <p>In 2022, the City will evaluate the 2021 pilot program in coordination with regional partners, and anticipates continuing the program with an expanded reach. The expanded program will require engaging additional commercial site owners and undertaking a new round of education and performance monitoring. This work is expected to begin in the second half of 2022.</p>	<p>Due Date: N/A, Ongoing</p>

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 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 webpage: (<http://www.cityoflfp.com/index.aspx?nid=181>).

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

Task ID	Task Description	Schedule Notes
PI-1	<p>Make opportunities available for the public to provide input on the draft SWMP Plan.</p> <p>Council meetings are public meetings where public comment is open to provide input on the SWMP, Council meeting are currently being held virtually, 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.</p> <p>As noted in Table 1-1, a public outreach and engagement plan will be developed for the SMAP that will identify overburdened communities in the City and plan appropriate efforts to involve these community members in developing the SMAP.</p>	Due date: March 31, 2022
PI-2	Post the SWMP, annual report, and any other documents related to stormwater permit on the City's website.	Due date: May 31, 2022
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:

- Ongoing mapping and documentation of the MS4.
 - 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 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.

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	Initiate mapping of all known connections from the MS4 to privately-owned stormwater systems. This is expected to include review of recorded property documents, field investigations, and other research to confirm asset ownership and operating responsibilities.	Due date: August 1, 2023
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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 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 Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual, Herrera Environmental Consultants, Inc. (May 2013) or another of comparable or improved effectiveness.
 - Document the field screening methodology in the annual report.
 - Complete field screening of an average of 12% of the MS4 each year. Track total percentage of the MS4 screened beginning August 1, 2019 – December 31, 2023.
 - 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. 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, including spills or illicit connections 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.
 - 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 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.
- Adopted the 2016 King County Stormwater Pollution Prevention Manual by reference in LFPMC 16.25.035.
- Adopted the 2016 King County Washington Surface Water Design Manual by reference in LFPMC 16.24.10(B).
- 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 (ICID) Field Screening and Source Tracing Guidance Manual (Herrera Environmental Consultants, Inc.; May 2020 Revision).
- 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. In 2021, City staff from multiple departments participated in a virtual, DPW-led training to review spill response roles and responsibilities.
- Continued to develop and implement an IDDE public education program.
- Continued to respond to complaints/illicit discharge concerns while tracking inspections associated with investigation and discharge elimination.

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.		
Applicability: Applies to the City’s municipal separate storm sewer system, or 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 2022, these efforts are expected to include sharing IDDE-related educational content as described in Section 2, 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 ICID field screening at MS4 outfalls to maintain an average of 12% of the MS4 inspected each year. Field screenings shall comply with the City’s selected ICID reference manual (see Section 5.2) and the total percentage of the MS4 screened as of the end of the reporting period will be determined.	Due Date: December 31, 2022
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 Appendix 12 as part of the annual report.	Due Date: Maintain Records – N/A, Ongoing Submit Data – March 31, 2023
IDDE – 6	Continue to educate and train staff who may encounter illicit discharges/connections or are responsible for response activities in the requirements of this program. Staff training opportunities in 2022 are yet to be determined.	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.

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 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 1149. This ordinance modified Lake LFPMC Chapters 16.08, 16.24, 18.48 and 18.58 to specify the 2016 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 good for 3 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).		
Applicability: All new development, redevelopment, and construction sites that meet conditions requiring drainage review per the King County Surface Water Design Manual.		
Task ID	Task Description	Schedule Notes
CTRL-1	Work with City Council to enact an Ordinance amending the LFPMC to adopt the 2021 KCSWDM, thereby ensuring compliance with Permit Section S5.C.6.b.	Due Date: June 30, 2022.
CTRL-2	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-3	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-4	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-5	Continue to makes 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 Public Works Department and hired 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, 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 two years. Clean catch basins if inspection indicates cleaning is needed to comply with maintenance standards. Decant material must be disposed of in accordance with 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 right-of-ways, 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 Activities

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

- The City Department of Public Works (DPW) has implemented the following maintenance standards, practices, policies, and procedures to prevent or minimize stormwater impacts:
 - 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, 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 conducts and documents spot checks of known problem areas following storm events.
- CESCL Certifications are maintained for DPW crew members. Other trainings such as Stormwater Inspector Certification are provided as needed and when available. For instance, in 2021, DPW crew members received traffic control flagger training.
- Operation and maintenance activities are documented through the DPW work order database and iWorQ asset management system.
- DPW has established and 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 2019 and will continue to be updated as necessary.

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.		
Applicability: All stormwater treatment and flow control facilities, catch basins, streets and roadways, and non-roadway public properties managed by the City.		
Task ID	Task Description	Schedule Notes
O&M-1	Continue to implement and adhere to the maintenance standards, policies, practices, and	Due Date: N/A, Ongoing

	procedures described in Section 7.2.	
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 Date: Inspections: December 31, 2022 Maintenance: varies per facility based on type of maintenance required
O&M-4	Inspect at least 95% of catch basins and inlets owned or operated by the City. Perform cleaning as needed to comply with the maintenance standard.	Due Date: August 1, 2023
O&M-5	Finalize updates to the Public Works Facility Stormwater Pollution Prevention Plan per 2021 reissuance of King County’s Stormwater Pollution Prevention Manual and KCSWDM.	Due Date: December 31, 2022.
O&M-6	Continue staff training as needed. Training opportunities for 2022 are to be determined.	Due Date: N/A, Ongoing
O&M-7	Continue documentation and tracking in databases and iWorQ software system.	Due Date: N/A, Ongoing
O&M-8	Finalize creation and consolidation of DPW stormwater policy, practice, and procedural documentation.	Due Date: December 31, 2022.

7.4 Lead Department and Support

The Public Works Department has the primary responsibility for implementing municipal operations and maintenance activities.

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 operations 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 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 Appendix 8.
- By August 1, 2022, establish an inventory that identifies publically and privately owned commercial and industrial properties which have the potential to generate pollutants to the MS4. Refer to 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 inspect 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 legitimate complaints.
- By January 1, 2023, implement a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable time period.
- 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.

8.2 Current Activities

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

- The City contracted with a professional engineering consultant in 2021 to assist DPW in developing required municipal code provisions, refine its draft inventory of regulated sites/businesses, educating stakeholders of new requirements, and creating a resourcing plan for required inspections. Work on these tasks is ongoing.

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		
Applicability: Pollutant-generating properties as characterized in the Permit		
Task ID	Task Description	Schedule Notes
SC-1	Develop a final inventory of properties to be regulated under the new source control program.	Due Date: August 1, 2022
SC-2	Prepare final draft ordinance and municipal code updates to establish source control program and associated enforcement policy and work with City Council to enact these changes.	Due Date: August 1, 2022
SC-3	Develop a resourcing strategy for the City's source control inspection program and secure and appropriate resources. Train and otherwise prepare inspection resource staff as necessary to enable initiation of inspection program by due date.	Due Date: January 1, 2023

8.4 Lead Department and Support

The Public Works Department has the primary responsibility for implementing Source Control Program for existing development.

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 Activities

The City currently pays into the collective funds supporting the 3 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 Parks 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. The group posts its findings of McAleer and Lyon creek at: <http://www.lfpstreamkeepers.org/>.

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	Pay into collective funds for regional monitoring.	Due Date: Per Ecology invoice.

S8.4 Lead Department and Support

The Public Works Department 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 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 five 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 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 2021 Annual Report and 2022 SWMP Plan.	Due date: March 31, 2022
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, 2022. 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.