

CITY OF LYNDEN

STORMWATER MANAGEMENT PROGRAM 2015 ANNUAL REPORT



**CITY OF LYNDEN
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This document serves as Attachment A to the City of Lynden's 2015 Annual Report submittal to the Department of Ecology for its Phase II NPDES Municipal Stormwater Permit

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List of Attachments

Attachment A: Stormwater Management Program Report documented here

Attachment B: Compliance with Standards Reporting per S4.F.3 C

Attachment C: Stormwater Capital Improvement Plan per Phase II Appendix 2

Attachment D: TMDL Water Quality Monitoring Report per Phase II Appendix 2

1.0 Introduction

The City of Lynden (City) has developed a Stormwater Management Program (SWMP) to meet the terms and conditions of its Western Washington Phase II Municipal Stormwater Permit (Permit) under the National Pollutant Discharge Elimination System (NPDES). This permit is required because the City of Lynden has been designated by the Environmental Protection Agency and the Washington State Department of Ecology as one of thousands of municipalities in the United States requiring a special stormwater permit. These permits were deemed necessary because stormwater runoff from streets, parking lots, construction sites, industrial properties, and residential areas is now recognized as one of the leading sources of pollution to our streams, lakes, wetlands, the Nooksack River and Puget Sound. In addition, the City has requirements to monitor fecal coliform levels in stormwater as part of the Nooksack River Total Maximum Daily Load (TMDL) study.

The Phase II Permit allows municipalities to discharge stormwater from municipal systems into “waters of the state” such as rivers, lakes and streams, as long as there are programs in place to reduce pollutants in stormwater to the “maximum extent practicable”. Much of the stormwater runoff from the City of Lynden’s municipal separate storm sewer system (MS4) discharges into Fishtrap Creek, a tributary to the Nooksack River that runs through the middle of the City. Smaller volumes of stormwater go to Kamm Creek and Duffner Creek (other Nooksack Tributaries), and some stormwater goes directly into the Nooksack River. Eventually, all of the stormwater from the Lynden MS4 goes into the Nooksack River. Regulating stormwater quality is a designated component of the City’s Comprehensive Plan. Requirements under the NPDES Phase II Permit provide the City opportunities to accomplish cleaning up these waterways.

The Permit issued by the Department of Ecology (Ecology) became effective August, 1 2013, and goes through July 31, 2018. The City is required to file an annual report and supplemental attachments by March 31st each year of the Permit term. The annual report details the permit compliance accomplishments carried out during the previous calendar year and activities planned for the coming year. This SWMP document serves as Attachment A to the City of Lynden’s Annual Report submittal to Ecology.

1.1 City Organizational Responsibilities

The City of Lynden’s Public Works Department holds the primary responsibility for developing the stormwater program and tracking Phase II Permit requirements. Within the Public Works Department, program administration is carried out by the Public Works Director, Program Manager, and administrative staff. Inspection, testing and tracking duties are carried out by the administrative staff and the Public Works Systems and Operations crews. The Planning Department, Parks Department, Fire Department, and Police Department also hold integral roles in implementing certain components of the stormwater program.

In 2015, the City of Lynden continued internal coordination on stormwater issues. Efforts included training of City Public Works and Parks crews, Stormwater Committee meetings, presentations at Public Works Committee Meetings and Council and site visits to document activities at City Streets, Parks, and Water/Wastewater Treatment plant facilities. The site visits encouraged interdepartmental discussion of stormwater issues and pollution prevention procedures and were also conducted in support of the development of stormwater pollution prevention plans for these facilities. Currently, the Stormwater Committee consists of the Public Works Director, Program Manager, and Administrative Office Manager, Streets-Systems Superintendent, Plant(s) Superintendent, and Parks Director. The Planning Director and

GIS Analyst have attended meetings and have been briefed on Phase II requirements. In 2016, Fire and Police will also be asked to attend as the Low Impact Development (LID) code integration gets underway. The following table details specific responsibilities of City personnel for permit elements. In addition, the City will coordinate with other jurisdictions, particularly the Whatcom Conservation District (WCD) and Whatcom County. Details are discussed in the following sections.

Table 1: Internal Stormwater Coordination -- Staff and Responsibilities

City of Lynden Staff Titles	Individual Responsibilities
Public Works Director Steve Banham	<ul style="list-style-type: none"> • Oversees the stormwater program (S5.A) • Has Signatory responsibility for annual reporting (per G19; S9.A)
Public Works Programs Manager Mark Sandal	<ul style="list-style-type: none"> • Coordinates and implements the stormwater program (S5.A) • Organizes the implementation of training programs (S5.C.3.c, S5C.3.e, S5.C.5.h) • Sets up the stormwater committee meetings (S5.A.5.b) • Coordinates interjurisdictional contracts and agreements for stewardship, education and outreach, and grant funding (S5.A.5.a) • Manages the City fats, oils, and grease (FOG) program and related business education on housekeeping practices (S5.C.1)
Public Works Administrative Manager Laura Burford	<ul style="list-style-type: none"> • Coordinates reporting & recordkeeping (S9, S5.A) • Works on refining cost tracking system (S5.A.3) • Coordinates permit compliance and scheduling (S5.A) • Posts water quality hotline number on website (S5.C.3.c) • Maintains website content and public involvement solicitations (S5.C1a, S5.C.2a,b)
Public Works Streets-Systems Superintendent Dale Tevelde	<ul style="list-style-type: none"> • Schedules and oversees stormwater system inspections (S5.C5.b,c,d) • Keeps stormwater system inspection records and reports to administrative manager (S9) • Addresses stormwater during safety meetings (S5.C.3.c, S5C.3.e, S5.C.5.h) • Implements BMPs and good housekeeping (S5.C.5)
Plant(s) Superintendent Tamara Adams	<ul style="list-style-type: none"> • Conducts educational tours of facilities and addresses stormwater issues (S5.C1.a) • Conducts water quality monitoring sampling and analyses for TMDL compliance (Appendix 2)
Parks Department Director Vern Meenderinck	<ul style="list-style-type: none"> • Implements BMPs and good housekeeping (S5.C.5) • Addresses stormwater during safety meetings (S5.C.3.c, S5C.3.e, S5.C.5.h)
Planning Department Director Amy Harksell	<ul style="list-style-type: none"> • Provides GIS mapping support to keep MS4 map up to date (S5.C.3.a) • Manages and oversees code revisions (S5.C.3.b and S5.C.4a)

1.2 Document Organization

This document is organized by program components in the order found in condition S5C of the Phase II Permit. A compliance with standards section was added at the end to document reporting conditions required in S4F. To facilitate cross-reference with the permit language, each permit item is presented along with the associated permit section indicator in parentheses as follows:

- ✓ Section 2.0 addresses the Stormwater Management Program Development (S5.A & S5.B)
- ✓ Section 3.0 addresses the Public Education and Outreach Component (S5.C.1)
- ✓ Section 4.0 addresses the Public Involvement and Participation Component (S5.C.2)
- ✓ Section 5.0 addresses Illicit Discharge Detection and Elimination (S5.C.3 & G3)
- ✓ Section 6.0 addresses Controlling Runoff from New Development, Redevelopment and Construction Sites (S5.C.4)
- ✓ Section 7.0 addresses Pollution Prevention and Operation and Maintenance for Municipal Operations (S5.C.5)
- ✓ Section 8.0 addresses Monitoring (S8)

2.0 **Stormwater Management Program Development (S5.A and S5.B)**

2.1 Permit Requirements

Sections S5.A and S5.B of the Permit require the City to:

- Develop and implement a Stormwater Management Program and submit annual compliance reports
- Manage an ongoing program for gathering, tracking, maintaining and using information to evaluate the SWMP development, implementation and permit compliance and set priorities
- Track the cost of the development and implementation of the SWMP
- Track the number of inspections, official enforcement actions and types of public education
- Coordinate with other NPDES permittees and partners in the region on stormwater related policies, programs, and projects
- Coordinate internally among City Departments and document the efforts

2.2 Accomplishments in 2015

The City of Lynden has been developing and implementing a Stormwater Management Program to reduce the discharge of pollutants from the municipal stormwater system to the maximum extent practicable in order to protect water quality. Sections 3.0 through 9.0 summarize the efforts the City has initiated and provide additional detail on the protocol that the City is building.

2.3 Plans for Program Activities in 2016

The City plans to continue to build its stormwater program with a focus on education and outreach, public involvement, partnering, and code revisions to cover utilization of Low Impact Development (LID) where feasible.

3.0 Public Education and Outreach (S5.C.1)

3.1 Permit Requirements

Section S5.C.1 of the Permit requires the City to address the following public education and outreach elements:

- Develop an education program that targets specific audiences including the general public (including school age children), businesses, homeowners, landscapers, property managers, engineers, contractors, developers, review staff and land use planners, and other City employees
- Create stewardship opportunities
- Develop a program that aims to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts
- Measure improvements in the target audience's understanding of the problem and what they can do to solve it. Use this information to improve the education program
- Track and maintain records of public education and outreach activities

Accomplishments in 2015

The City of Lynden coordinated water quality sampling with Whatcom County and entered an interlocal agreement with the Whatcom Conservation District to conduct additional sampling and education and outreach.



Fishtrap Creek Exploration Day, April 22, 2015: Whatcom Conservation District (WCD) in partnership with Whatcom County Public Works put on this evening event with the goal to engage Lynden residents to understand how a watershed functions, importance of clean water and how each of us can help. Clean water is essential for the health of our livestock, crops, wildlife, salmon, shellfish and our community. There were information stations set up as well as interactive ways of taking water samples and learning about water quality.

Presenters included Aneka Sweeney (WCD), Corina Cheever (WCD) and Erika Douglas (WCPW). Twenty-three Lynden residents attended.

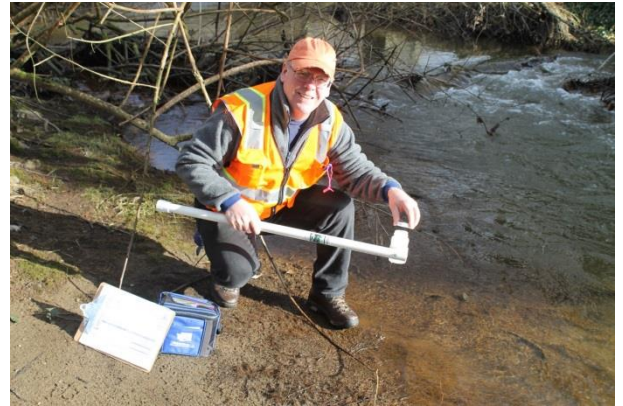
Citizen Science Monitoring Program: The City of Lynden has partnered with WCD and Whatcom County Public Works which have developed a citizen science water quality monitoring program. The program was built to enhance current monitoring, connect local citizens with their neighborhood creeks, educate and empower volunteers to prevent polluted stormwater and encourage stewardship.

Recruitment and Training:

- Water Quality Volunteer Training, June 3rd 2015 was an event to educate and inform the public on current state of water quality, shellfish and salmon recovery in Whatcom County. Provide a

refresher for current water quality testing volunteers for best practices and consistency of data recording and collection. Recruit and train new volunteers so there is a competent pool of citizen scientists to pull from for future efforts. Aneka Sweeney (WCD) organized, facilitated and presented. Forty-eight Whatcom County residents attended.

- Lynden Training, June 9th 2015, took place on Fishtrap Creek with 4 volunteers. The goal was to train volunteers on safety procedures, monitoring protocols and equipment, data sheets, communication plan and where the sites are located. Aneka Sweeney (WCD) organized event and presented the stormwater program and local water quality issues. Four Lynden volunteers attended.



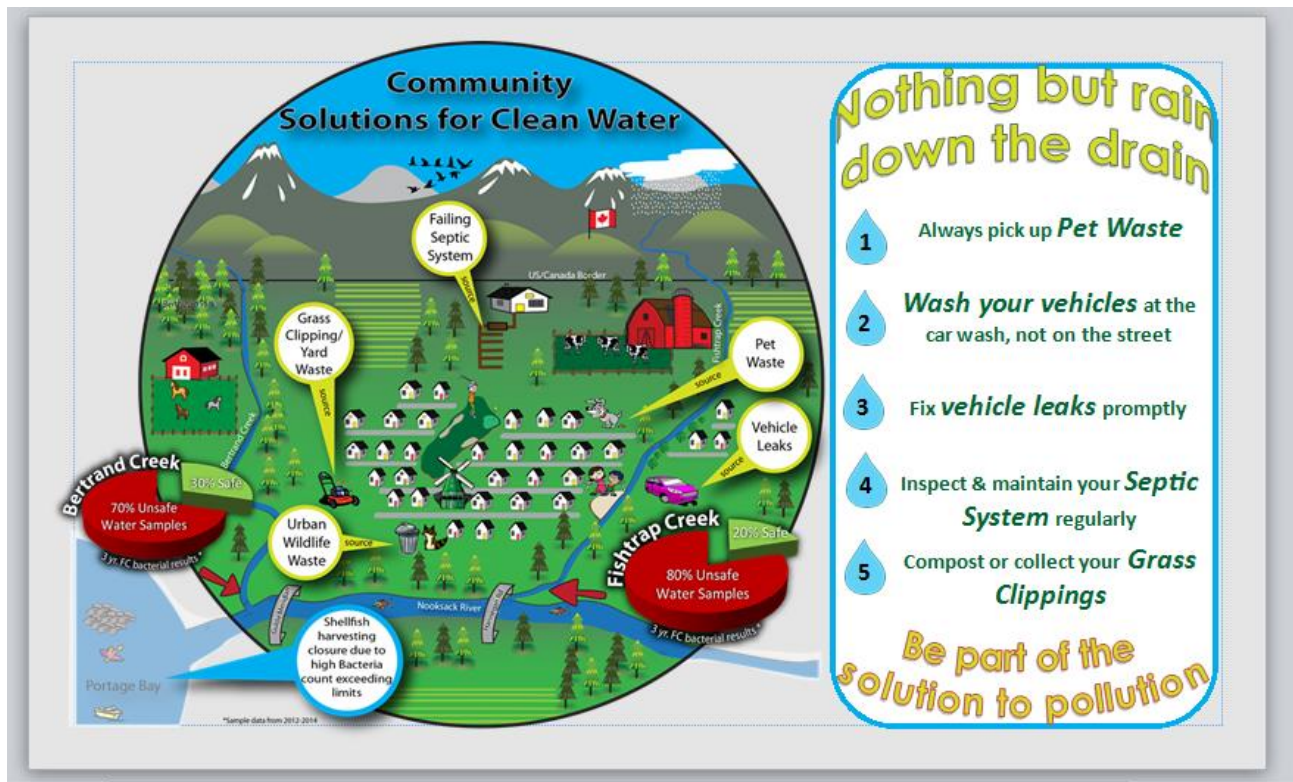
Wheat Week: WCD in partnership with the Washington Grain Commission teaches Wheat Week to elementary students in Whatcom County. Wheat Week is a series of five lessons, delivered over the course of one week, educating students in 4th and 5th grade about water, soil, watersheds, energy, systems, and wheat, and how they impact our lives. Students discover what a watershed is and how individuals affect the watersheds we live in. Students create individual paper watershed models and learn about the impacts of land planning, pollutants, and stormwater.

- Attendance: 1128 students, 47 teachers throughout Whatcom County
- 295 students, 13 teachers in Lynden School District.



WCD Newsletter: 3,000 newsletters printed and distributed. This newsletter contained articles on water quality and farm planning and had a large layout exemplifying completed projects and landowner stories. The publication was distributed countywide and was specifically mailed to rural landowners in the Lynden area.

Lynden Stormwater Infographic: WCD produced a draft pollution prevention infographic for use in newsletters, on the web, and to hand out at events. In addition, the City is investigating a version of the brochure to be added to the Welkom baskets that new residents receive. Sources and solutions to pollution are depicted as well as the current water quality status in a fun and colorful diagram.



Business Education Efforts: The City worked with the County Health Local Source Control specialist to prioritize businesses for pollution source visits and education on good housekeeping practices. Educational materials were distributed to the businesses and the County sent follow-up letters itemizing specific recommendations for pollution prevention. Through the City's city-wide fats, oil and grease (FOG) program, inspections of grease removal devices were conducted two times and included education on good housekeeping practices.

Table 2: Education and Outreach Activities Undertaken In 2015

Educational Activity	Description of Activity	Target Audience
<i>City of Lynden</i>		
City Website	The City added a website page to introduce the stormwater program to the public. Links to educational factsheets were included as well as other sources of information	General Public, Businesses
Public Notices	The City provided Lynden Tribune with public notices regarding the new stormwater permit	General Public, Businesses
Wastewater/Water Treatment/Stormwater Educational Tours	Two tours were conducted of the wastewater treatment plant and composting system for Lynden schools reaching approximately 80 students. Two open houses were conducted showcasing the new wastewater plant reaching 150 community members. In addition, 12 private tours were offered to other jurisdictions.	School Children, Community members, other jurisdictions
Partnering with County and CD	Educational outreach/ stewardship and water quality monitoring	Community members, school children
Local Source Control / FOG	The City conducted semi-annual FOG visits to 38 business establishments in 2015. County Health visited seven establishments in the vicinity of Lynden; three inside the city limits.	Businesses, churches, schools

3.3 Plans for Program Activities in 2016

- Continue Wheat Week in all Lynden elementary schools
- Publish educational infographic and mail to residents
- Highlight citizen science monitoring and stormwater prevention in WCD newsletter
- Continue and enhance collaborative water quality monitoring program
- Develop a mobile watershed model to be used in schools and at events to demonstrate how polluted stormwater enters our stream and solutions to this issue
- Conduct presentations and workshops on water quality throughout the Lynden Community
- Continue collaboration with Whatcom County, North Lynden WID, Whatcom Clean Water Program and Whatcom Conservation District to ensure City of Lynden is well represented and the most up-to-date outreach materials and methods are being employed
- Work with NW Washington Fairgrounds and Event Center to develop a stormwater management plan and outreach program in conjunction with available grant funding
- Continue FOG inspections. Four new businesses are currently known to be opening and will be added to the FOG list in 2016 bringing the total to 42 sites
- Continue partnership with County Health for local source control visits in Lynden
- Investigate working with auto shops on a don't drip and drive campaign

4.0 Public Involvement and Participation (S5.C.2)

4.1 Permit Requirements

Section S5.C.2 of the Permit requires the City to address the following public involvement and participation elements:

- Provide ongoing opportunities for public involvement in the SWMP process through committees/commissions and updating the SWMP
- Make the SWMP and Annual Compliance Report available to the public, including posting on the City’s website

4.2 Accomplishments in 2015

The City of Lynden provided opportunities for public involvement and participation in 2015 through City Council and Public Works Committee meetings. Status reports on the stormwater management program were presented at monthly Public Works Committee meetings. These meetings are open to the public and are always listed on the website. In addition, the current website calls for comment and questions on stormwater management and solicits involvement on the SWMP once this annual report is posted. Public involvement opportunities are summarized in Table 3. The City also was the recipient of 4 stormwater grants (Table 4) that will involve public input and will be showcased once completed.

Table 3: Public Involvement Opportunities Undertaken in 2015

Public Involvement Opportunity	Description
City Council Meetings	City Council holds meetings twice a month. These are open to the public
Public Works Committee Meetings	Public Works Department holds monthly committee meetings that are open to the public
Website posting of new stormwater information	City stormwater website page introduces the new program to the public and provides links to other resources and solicits comment on and questions regarding stormwater management

Table 4: Stormwater Grants Awarded to Lynden

Grant	Partner	Description of Activity
<i>City of Lynden</i>		
Pepin Creek Restoration Project	City of Lynden	Relocate two significant Nooksack River watershed tributary fish-bearing deep roadside ditches into a single forested meandering stream channel.
Fishtrap Creek Stormwater Project	Whatcom CD	Reduce stormwater runoff and improve water quality in Fishtrap Creek by designing and constructing low-impact development stormwater practices at the Northwest Washington Fair and Event Center in the City of Lynden.
Watershed Improvement District Planning	Whatcom CD	Develop comprehensive surface water management plans for four Whatcom County Watershed Improvement Districts formed in 2014 and update the existing management plan for one district expanded in 2014.
Whatcom County Enhanced Pollution Identification and Correction Program	Whatcom County	Apply an enhanced and adaptively managed pollution identification and correction program to reduce bacteria levels in creeks and marine waters to an expanded geographic area in Whatcom County.

4.3 Planned Activities for 2016

The City plans to offer public involvement opportunities on many fronts in 2016. First, the City will continue partnering with the County and WCD to establish volunteer coordinators and develop stewardship opportunities. The City will start design on the grants received and potentially pursue grants in partnership with other entities to support new public involvement programs.

In 2016, the City will begin the process of updating the municipal code to integrate and promote low impact development (LID) as the preferred option for runoff control. This will expand on the current application by the City of the Department of Ecology Western Washington Stormwater Manual. This will involve creating an external stakeholder’s committee that will be called to several meetings where input will be solicited. Announcement in the Lynden Tribune will address the planned code revisions, council Meetings and public process schedule.

5.0 Illicit Discharge Detection and Elimination (S5.C.3)

5.1 Permit Requirements

Section S5.C.3 of the Permit requires the City to address the following illicit discharge detection and elimination (IDDE) elements:

- Develop an ongoing program to detect and remove illicit discharges, connections, and improper disposal, including any spills into the municipal separate storm sewers owned or operated by the City
- Continue to update the map of the municipal storm drainage system

- Implement an ordinance that prohibits illicit discharges, and create a program to detect and address illicit discharges
- Publicize a hotline or other local telephone number for public reporting of spills and other illicit discharges
- Train City staff on proper IDDE and spill response procedures
- Track all spills, illicit discharges and connections reported to the City and response actions taken, including enforcement actions

5.2 Accomplishments in 2015

The City has taken steps to identify and eliminate illicit discharges. The City has a comprehensive map of its Municipal Separate Storm Sewer System (MS4). The map contains known municipal storm sewer outfalls and receiving waters, and structural stormwater BMP's owned or operated by the City. The City retains development records, and updates the map on an annual basis to show all connections. The map is kept current in GIS. Copies of the map are available to the public. The current GIS mapping will be incorporated into a comprehensive Asset Management System (Cartegraph OMS) which will allow better access by City staff to MS4 mapping and allow recording and tracking of actions taken to eliminate illicit discharges.

A code revision process was completed for illicit connections and discharges to support the future efforts in detection and enforcement. This included presentations to the public works committee and the City Council where the Fire Department was present. The Council presentation was followed by an article in the Lynden Tribune.

Summary of program specifics include:

- The Stormwater Committee held quarterly meetings or one-on-one consultations
- Additional training for Public Works and Parks crews on IDDE procedures were held with 13 attendees
- The County Health Department visited 7 businesses in the vicinity of Lynden to provide education on good housekeeping procedure; 3 were in the City limits
- 38 establishments were inspected twice as part of the FOG program
- Illicit Discharge code was revised, reviewed, and adopted December 21st, 2015
- Public Works worked with Police and Fire to respond to spill calls and water quality violations (detail below)
- Conducted sampling upstream of outfalls to bracket inputs of bacteria to the MS4 (see compliance section 9.0 for more detail)
- Increased catchbasin cleaning frequency in areas of IDDE concern
- Received budget approval for the purchase of a self-propelled storm/sewer camera to pipe inspection.

Water quality, illicit discharge hotline numbers are posted on the City's website:

- **(360) 354-3446** during work hours (8 am to 5 pm)
- **(360) 815-5755** outside of normal working hours

The Public Works Department has the ability to record all calls regarding illicit discharges or illegal spills that are received on the hotline. In 2015, the department responded to 8 incidents. Several of these were calls on the hotline while others were email notifications from Ecology through their ERTS system. The Fire Department also responded to 2 calls attended the scene and then reported or referred to the Public

Works Department. These included pollutants such as sewage overflows, fuel spills, hydraulic oils and paint disposal. All circumstances were dealt with fully and resolved by either containment prior to entering the MS4 or by City or private contractor vacuum cleaning catchbasins. Also, yard clipping disposal and bank encroachment and erosion along Fishtrap Creek were reported to the City and these are being handled through the education program.

The illicit discharges reported to the water quality hotline and those identified by the staff are typically associated with less toxic discharges such as small fuel spills or wash-down water and can be handled by public works staff. Most of these are not continuous and can be addressed directly with the discharger. The City developed a spill response plan that is housed at the public works administrative department, street department shop, parks department shop, and at the wastewater treatment plant. This plan offers detailed instructions to first responders with steps for containment, if safe. Emergency contacts and reporting requirements are explicitly discussed. A spill report form is used to document an event. All crew vehicles have a mobile spill kit for containment and cleanup of small spills. The street and parks crews received training on the spill response plan and safety meetings address any additional questions or concerns that arise.

Medium and large spills require the fire department and/or police department to be notified. These departments have emergency response protocols that include procedures for characterizing the nature of and potential threat to the public from illicit discharges. Because the City is not equipped to respond to all hazardous spills, the City relies on Whatcom County Department of Emergency Management (WDEM), Ecology and other agencies to assist in coordinating response.

5.3 Planned Activities for 2016

- Continue to respond to dry weather outfall discharges. City staff or contractors will trace sources of dry weather flows from the outfalls to Fishtrap Creek as practical
- Work on source control in conjunction with County Health to determine potential sources and work toward reducing the potential of these outfall contributions to the water quality violation of Fishtrap Creek
- Partner with the County Natural Resource Department and WCD to use “Crush” the sewage sniffing dog.
- Investigate options for microbial source tracking (DNA testing) on samples to identify the presence of human waste entering the MS4
- Develop shorter spill response instructions to be laminated and posted in shops and carried in crew vehicles
- Purchase a self-propelled storm/sewer camera to perform inspections of City storm piping systems.
- Provide information to City Police and Fire personnel on spill response.

6.0 Controlling Runoff from New Development, Redevelopment and Construction Sites (S5.C.4)

6.1 Permit Requirements

Section S5.C.4 of the Permit requires the City to address the following elements regarding controlling runoff for new development, redevelopment and construction sites:

- Develop, implement, and enforce a program to reduce pollutants in stormwater runoff discharging to the municipal separate storm sewer system from new development, redevelopment, and construction site activities
- Adopt an ordinance to address runoff from new development, redevelopment, and construction activities from both public and private sites using Appendix 1 as the standard including site planning requirements, BMP selection, design and infeasibility criteria, BMP limitations, and Low Impact Development related code
- Develop and implement a planning process for development that includes plan review, inspection, and enforcement capability
- Provide provisions for long-term operation and maintenance of permitted stormwater facilities
- Provide copies of the Notice of Intent (NOI) for construction or industrial activities to representatives of the proposed new development and redevelopment
- Provide training to staff on the new codes, standards, and standard operating procedures
- Develop a process to record and maintain all inspections and enforcement actions by staff

6.2 Accomplishments in 2015

The City is not yet required to take action under this permit element except to make available copies of Notice of Intent for construction activity (NOI) forms to those proposing new or redevelopment projects. Several components however are in place:

- City Staff instructs development applicants to comply with the Department of Ecology's Stormwater Manual requirements and specifically those Best Management Practices related to new development or redevelopment
- Public Works Department reviews stormwater site plans and maintenance plans for all new development and redevelopment projects
- The City also usually contracts with a qualified engineering firm for construction inspections on larger projects, and enforces implementation of Best Management Practices during construction, as needed
- The City Permit Center provides Notice of Intent (NOI's) for all permitted development
- The City Public Works Department (Systems Division) currently inspects public stormwater facilities

6.3 Planned Activities for 2016

The City is gearing up for the LID code integration effort due December 2017. This process will include developing an internal planning team and an external stakeholder team. The code will be reviewed and suggested text changes will be made and presented to both committees. Comments will be incorporated with legal review and amendments will go through public process prior to adoption. In addition, standards and rules will be reviewed to align with LID code changes. The City plans to continue to review development plans, require stormwater BMPs, and update the MS4 map on GIS and the City's Asset

Management System with facility information. Post-2013 site inspections for maintenance of runoff control are scheduled to begin in 2016.

7.0 Pollution Prevention and Operation and Maintenance for Municipal Operations (S5.C.5)

7.1 Permit Requirements

Section S5.C.5 of the Permit requires the City to address the following pollution prevention and operation and maintenance elements:

- Develop and implement an operations and maintenance program, with the ultimate goal of preventing or reducing pollutant runoff from municipal operations.
- Adopt maintenance standards for the municipal separate stormwater system that are at least as protective as those specified in the Ecology's 2012 Stormwater Management Manual for Western Washington
- Perform annual inspections and necessary maintenance of municipally owned stormwater flow control and treatment facilities and inspect and clean catchbasins throughout the City on a circuit basis
- Develop Standard Operating Procedures to reduce stormwater impacts associated with runoff from municipal O&M activities
- Train staff to implement new procedures
- Prepare Stormwater Pollution Prevention Plans (SWPPPs) for all heavy equipment maintenance or storage yards identified for year-round facilities or yards, and material storage facilities owned or operated by the City

7.2 Accomplishments in 2015

The City of Lynden maintains its stormwater facilities as needed and responds promptly to reported maintenance issues. The City is not yet required to take action under this permit element; however, several components are in place:

- Conducted street sweeping and gutter cleaning on a regular basis
- Began development of stormwater pollution prevention plans (SWPPPs) for the Street Department shop, the Parks Department shop and the Wastewater Treatment Plant.
- Conducted a training for maintenance and street crew staff on stormwater protocol and pollution prevention and IDDE
- Inspected and cleaned catch-basins on a rotational circuit basis
- Additional training for Public Works and Parks crews on pollution prevention and good housekeeping procedures were held with 13 attendees

Over the last 5 years the Public Work Crew has been cleaning the catchbasins in the City's stormwater system finishing the circuit in May of 2014. In September 2014, a few of the basins on some of the major arterials were inspected again and not much debris was found. In 2015, the circuit was started again but very little debris was found in the catchbasins so focus was shifted to the main arterials and support of IDDE efforts.

There is no set street sweeping schedule in the City of Lynden. Streets are swept after every storm events, starting with the major arterials, beginning at one end of the city and working toward the other (normally working east to west). . In the fall, when the leaves are falling, some streets are swept every day. Other

times of the year the goal is to cover the entire city at least once a month depending on the amount of debris on the streets. The City often sweeps the main arterials 2-3 times a month.

7.3 Planned Activities for 2016

The City plans to continue to develop good housekeeping protocol for pollution prevention and maintenance associated with municipal operations. The City will continue to monitor the catchbasins on major routes and some of the secondary routes and begin the City-wide inspection circuit again. Street sweeping will also continue.

8.0 Monitoring (S8.C.1.b and S8.C.2)

The City of Lynden has 12,930 people which typically would trigger an individual stormwater monitoring program or payment into the regional stormwater management program for status and trends monitoring and effectiveness monitoring. As a first time Phase II permittee, Lynden is not required to perform or pay for stormwater monitoring under S8.C.1. Lynden is however required to carry out monitoring per Appendix 2 of the permit to meet TMDL requirements. Attachment D discusses this monitoring plan and details the results from the 2015 fecal coliform monitoring effort at a BC Avenue catchbasin.

8.1 Planned Activities for 2016

The City will continue monitoring for fecal coliform at BC Avenue as outlined in the Quality Assurance Project Plan (QAPP) and compile results of inspection records for annual reporting per Appendix 2 of the permit.