

Lakes Highway District National Pollution Discharge Elimination System (NPDES)

NPDES Permit # IDS-028207

2019 Annual Report

Permit Year: January 1, 2019 – December 31, 2019



Lakes Highway District
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1. Report Certification

Lakes Highway District, NPDES Municipal Separate Storm Sewer System ("MS4") Annual Report for Permit Year 2019.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."



Rodney A. Twete, Board Chairman
Lakes Highway District

2/3/2020

Date

This report identifies activities undertaken by the Lakes Highway District (“LHD”) during the eleventh (11th) permit year as required by Part II of the Lakes Highway District Municipal Separate Storm Sewer System (“MS4”), NPDES Permit (permit). The 2019 permit year, as defined in this report, covers the period from January 1, 2019 – December 31, 2019.

On November 20, 2008, the United States Environmental Protection Agency (EPA) issued to the Lakes Highway District (District) a storm water discharge permit, NPDES Permit #IDS-028207. The permit became effective January 1, 2009 and contains requirements for implementation of the permit.

Lakes Highway District applied for a joint permit on June 20, 2013 with the Post Falls and East Side Highway Districts and is currently operating under an extension of the existing 2009-2013 permit as provided for by U.S.E.P.A.

2. Status of Implementing Components of the Storm Water Management Program

There was a change in the management structure of LHD’s Storm Water Management Program during the seventh (7th) permit year. The Program is administered under the guidance of the LHD Director of Highways. The Director of Highways is assisted by Ruen-Yeager & Associates, a consulting engineering firm. In addition, the Deputy Director of Highways assists with the storm water program. The duties of the staff are briefly described as follows:

Table 1. NPDES Staff Positions and Duty Descriptions		
Position	Position Type	Duty Description
Director of Highways	Full-Time	Oversees and Responsible for Highway District Operations and Storm Water Management Program
Consulting Engineer	Part-Time	Assists Director with Mapping, Monitoring, Public Outreach, and MS4 Permit Compliance.
Deputy Director of Highways	Full-Time	Responsible for Maintenance Activities, Approach Permitting, assists with Construction Inspections.

Additionally, Maintenance and Operations staff at LHD participate in the implementation of the NPDES permit requirements. Maintenance and Operations staff observe roads daily and are responsible for reporting potential illicit discharges, spills, stormwater, and erosion control issues impacting LHD Roads.

A. Storm Water Management Program Components

Program status is based upon the NPDES permit issued by the EPA in November of 2008 and the schedule of compliance included in Part II of the Permit. The status of each component is described in this section.

1) General Requirements:

a) Develop, Implement and Enforce a Storm Water Management Program ("SWMP").

During the first permit year, the LHD began the development of a SWMP. The SWMP is a 3-ring binder located at the District's main office and includes the following information:

SWMP Contents	
Permit	Permit Comments
Annual Reports	Resolutions
Facility Operations Plan	IDDE Program
Illegal Dumping Procedures	Spill Response Plan
Training Log	MS4 Mapping
Public Tracking Log	Correspondence
Construction General Permit Requirements	Storm Water Pollution Prevention Plan Guidelines

As an initial step towards the development of a SWMP, the LHD Board approved Resolution 2009-12 Establishing NPDES Permit Programs and Local Requirements. Resolution 2009-12 emphasizes the following new and existing requirements:

Resolution 2009-12	
Description	Policy / Standards
All construction activities performed by the Highway District, disturbing more than 1-acre, shall comply with EPA's Construction General Permit (CGP). This shall not be confused with Maintenance activities that do not modify the original line, grade and/or original intent of the facility as clarified by the 2003 CGP Fact Sheet.	Existing Policy District Stds
As part of the permitting process for work within public right-of-way and when storm water from construction projects have the potential to drain into waters of the US, contractors and their on-site foreman shall be pre-certified by the Storm Water Erosion Education Program (SEEP) .	New Policy
All construction site operators working within District Rights-of-Way on sites that drain to waters of the US shall have the SEEP Field Guide on-site at all times during construction for guidance in implementation of appropriate erosion control measures.	New Policy
Lakes Highway District Staff shall report storm water violations to the Kootenai County Code Enforcement Officer.	New Policy
Lakes Highway District Staff shall report and publish on the District's website that all work within the Highway District shall be in accordance with the Associated Highway District Standards, the Kootenai County Site Disturbance Ordinance, requirements for SEEP Training and other NPDES Permit requirements.	New Policy

Additionally, in 2010, Resolution 2009-12 was revised by resolution 2010-04. The following table summarizes the Districts current policy with respect to NPDES Permit Programs and Local Requirements:

Resolution 2010-04

Description	Policy / Standards
All construction activities performed by the Highway District, disturbing more than 1-acre, shall comply with EPA's Construction General Permit (CGP). This shall not be confused with Maintenance activities that do not modify the original line, grade and/or original intent of the facility as clarified by the 2003 CGP Fact Sheet.	Existing Policy District Stds
As part of the permitting process for work within public right-of-way and when storm water from construction projects have the potential to drain into waters of the US, contractors and their on-site foreman shall be pre-certified by the Storm Water Erosion Education Program (SEEP), <u>or other equivalent training program approved by Lakes Highway District.</u>	Revised Policy
All construction site operators working within District Rights-of-Way on sites that drain to waters of the US shall have the SEEP Field Guide, <u>or other District approved guide,</u> on-site at all times during construction for guidance in implementation of appropriate erosion control measures.	Revised Policy
Lakes Highway District Staff shall report stormwater violations to the Kootenai County Code Enforcement Officer.	Existing Policy
Lakes Highway District Staff shall report and publish on the District's website that all work within the Highway District shall be in accordance with the Associated Highway District Standards, the Kootenai County Site Disturbance Ordinance, requirements for SEEP Training and other NPDES Permit requirements.	Existing Policy

No additional Resolutions were passed in 2019 by the Lakes Highway District regarding storm water and NPDES related issues.

B. Minimum Control Measures

1) Public Education and Outreach

a) On-going Public Education Program

In 2009, LHD began working with the City of Coeur d'Alene and City of Post Falls to facilitate implementation of a televised Public Service Announcement ("PSA"). The PSA informs the public of local storm water and erosion control issues. The PSA consists of 30 second advertisements prepared by the local Storm Water Erosion Education Program ("SEEP"). In 2010 these PSA's were added to the District's website, www.lakeshighwaydistrict.com.

In 2015, Lakes Highway District, along with Post Falls Highway District and East Side Highway District, wrote a letter of support and agreed to co-fund a “Learning Station” for the University of Idaho grant application to develop the “Cleaner. Water. Faster: Bi-State Interpretive Clean Water Trail” Interpretive Trail for the four corners area in Coeur d’Alene. The University of Idaho was successful in securing the grant. The design of the “Learning Station” was completed in 2018 and was installed by the City of Coeur d’Alene in the spring of 2019. A digital copy of the sign is included in Appendix A.

The Highway Districts were approached with an opportunity to develop a PSA through the University of Idaho’s Cleaner. Water. Faster grant. On September 19, 2017, the video was filmed and in October of 2018 the video was completed and published on YouTube and linked by the University of Idaho website. As soon as feasible, the Highway District will also post the video on their website.

In addition to the PSA’s and website updates, LHD presented information regarding its NPDES Permit at the following events:

Event	Date
Environmental Open House, Coeur d’Alene City Library	September 9, 2010
Hayden Lake Watershed Association, Annual Meeting	2010
Hayden Lake Watershed Association, Annual Meeting	July 26, 2011
Multi-Agency Environmental Open House, held at the Coeur d’Alene Public Library	September 27, 2011
Multi-Agency Environmental Open House, held at the Coeur d’Alene Public Library	October 24, 2012
Multi-Agency Environmental Open House, held at the Lakes Highway District	December 4, 2013
Earth Day Multi-Jurisdictional Environmental Fair, Coeur d’Alene Public Library	April 19, 2014
Silverwood Physics and Science Days, Environmental Discovery Classroom, Silverwood Theme Park, Athol, Idaho	May 21 and 22, 2014

(RYA) member of local SEEP Coordination Group, IDEQ, Coeur d'Alene, Idaho	February, March 2014
Earth Day Multi-Jurisdictional Environmental Fair, Coeur d'Alene Public Library	April 18, 2015
Idaho Water Awareness Week, Presentation to Ramsey Elementary School at the Coeur d'Alene Wastewater Treatment Plant	May 7, 2015
Silverwood Physics and Science Days, Environmental Discovery Classroom, Silverwood Theme Park, Athol, Idaho	May 20 & 21, 2015
MS4 Permit Presentation, Idaho Association of Highway Districts	November 10, 2015
Science Day, Ramsey Elementary, Coeur d'Alene	December 11, 2015
Trees for the Earth – Earth Day Celebration 2016, Coeur d'Alene Public Library	April 24, 2016
Idaho Water Awareness Week, Presentation to Ramsey Elementary School at the Coeur d'Alene Wastewater Treatment Plant	May 9 th and 10 th , 2016
Adventure Learning Teacher's Stormwater Workshop for High School Teachers	June 24, 2016
Fernan Elementary Stormwater Presentation	April 17, 2017
Trees for the Earth – Earth Day Celebration 2017, Coeur d'Alene Public Library	April 22, 2017
Silverwood Physics and Science Day, Environmental Discovery Classroom, Silverwood Theme Park, Athol, Idaho	May 17, 2017
Earth Day Celebration 2018	April 22, 2018
Silverwood Physics and Science Day, Environmental Discovery Classroom,	May 15 & 16, 2018

Silverwood Theme Park, Athol, Idaho	
Ramsey Elementary 5 th Grade Stormwater Presentations	April 24 & 25, 2018
Earth Day Celebration 2019	April 28, 2019
Ramsey Elementary 5 th Grade Stormwater Presentations	May 7 & 8, 2019
Silverwood Physics and Science Day, Environmental Discovery Classroom, Silverwood Theme Park, Athol, Idaho	May 22 & 23, 2019

The open house events were sponsored by multiple local public agencies, including Lakes Highway District.

A Stormwater Runoff demonstration was developed as an additional effort for public education outreach (see Appendix A). There was a very positive response from the public when shown this display during the Earth Day event. This was also used during the Silverwood Physics & Science Day event and for school education efforts.

An effort to collect data concerning the effectiveness of our Public Education Outreach was implemented this year. For the Earth Day event, a questionnaire with four questions was used to gather the public's knowledge concerning stormwater and pollution prevention. This questionnaire was then used to raffle off a hanging flower basket (see questionnaire and pics in Appendix A). For the Ramsey Elementary 5th Grade Stormwater Presentations, we asked each class to answer 10 questions related to the presentation shown (see questionnaire and pics in Appendix A). The results of both questionnaires were recorded for a comparison in future years (see Appendix A).

To supplement our Public Outreach Stormwater Demonstrations, the three Highway Districts along with the City of Coeur d'Alene designed and had produced two large banner displays for stormwater and pollution prevention education purposes. These banners can be seen in Appendix A.

Lakes Highway District continues public outreach through the Ramsey Elementary 5th Graders Field Trip Stormwater presentations performed this year on May 7th and 8th, 2019. Two educational workbooks, "Discover Storm Water" and "Healthy Water, Healthy People" were handed out to the students and a copy can be seen in Appendix A.

Planned Activities for 2020 and beyond:

Lakes Highway District will continue to reach out to the local public through community events and opportunities to educate in local schools. Lakes will continue utilizing its website to inform the public regarding the importance of storm water and erosion control BMP's, to update the MS4 Outfall Map and continue to participate in local watershed and SEEP groups.

b) Distribution of Relevant Storm Water Information

Again, as a tool to educate and inform the public, the LHD established www.lakeshighwaydistrict.com during the first permit year. This website has continually been updated since implementation.

In the third permit year (2011), LHD distributed appropriate information (SEEP Training and Field Guides) to homeowners and contractors who obtained permits for construction within District right-of-way. Additionally, the LHD offers SEEP information to the public and displays SEEP Field Guides at the District Office. Refer to the permit tracking log included in Appendix B for SEEP information.

In the fourth permit year (2012), LHD placed informational door hangers on residences in a portion of the MS4 area. In all approximately 300 door hangers were placed.

In the fifth permit year (2013), LHD placed informational door hangers on residences in the Avondale Lake and South Hayden Lake MS4 areas. Approximately 200 door hangers were placed.

In the sixth permit year (2014), LHD placed informational door hangers on residences in the Avondale Lake outfalls. Approximately 200 door hangers were placed.

In the seventh permit year (2015), LHD placed informational door hangers on residences in the South Hayden Lake Road outfalls. Approximately 300 door hangers were placed.

In the eighth permit year (2016), LHD placed informational door hangers on residences in the South Hayden Lake Road outfalls. Approximately 300 door hangers were placed.

In the ninth permit year (2017), LHD placed informational door hangers on residences in the Avondale Lake areas. Approximately 200 door hangers were placed. Appendix F includes one of these door hangars.

In the tenth permit year (2018), LHD placed informational door hangars on residences in the Avondale area. Approximately 200 door hangers were placed. Appendix F includes one of these door hangers.

In 2014 and 2015, LHD in cooperation with the City of Coeur d'Alene and the Post Falls Highway District distributed "Storm Drain Dan" coloring books through outreach programs with the City. The coloring book is included in Appendix A.

As in previous years, in 2019 LHD also distributed SEEP Field Guides in conjunction with approach and utility permit applications, and to citizens through their front office. See Appendix B.

Planned Activities for 2020 and beyond:

Distribute appropriate and relevant storm water information to employees, the public and businesses with whom the District interacts. Continue placing door hangers in areas of the MS4 on a rotating basis to coincide with dry weather screening areas for that year. Maintain the "Learning Station" for the Storm Water Pollution Prevention Interpretive Trail Project as a cooperative effort with Lakes Highway District, Post Falls Highway District, and East Side Highway District.

2) Public Involvement and Participation

In 2019 public outreach consisted of providing information through the Lakes Highway District website and through personal contact at community events. LHD supported the Coeur d'Alene Area Multi-Jurisdiction "Earth Day Celebration" on April 28, 2019. This open to the public forum provided exhibits in a fun, educational, and informational setting to educate local residents and visitors how to protect and preserve the environment 365 days per year. This included storm water demonstrations, "Get Involved Booths", crafts and egg hunts, and outreach events for adults and children. See Appendix A for event advertisement and photos of the event.

LHD also supported the multi-jurisdictional Silverwood Physics and Science Day on May 22 and 23, 2019 at Silverwood Theme Park in Athol, Idaho. This is an event focused on middle school students and incorporates educational competitions including learning about the aquifer, storm water to ground water connections, environmental science, engineering, and construction skills. This event included IDEQ, the City of Coeur d'Alene, University of Idaho, Post Falls Highway District, Lakes Highway District, and East Side Highway District. See Appendix A for advertisement and photos of this event.

LHD also supported the City of Coeur d'Alene's efforts to distribute the "Storm Drain Dan" coloring book, "Discover Storm Water" workbook, and "Healthy Water, Healthy People" workbook to children to foster an awareness of the connection between storm water and waters of the US. These publications can be found in Appendix A.

Beginning in 2015 and continuing through 2017, LHD participated in the Regional Water Quality Public Education Group. This group is geared to create a regional consortium of resources for public education, development of a regional branding, and to provide opportunities for joint efforts of public outreach. There were no meetings scheduled in 2018 or 2019.

Planned Activities for 2019 and beyond include continuation with similar outreach opportunities completed in 2019. The Lakes Highway District has established a presence in local outreach efforts to provide stormwater education to the public.

3) Illicit Discharge Detection and Elimination

a.) Develop and implement a program to detect and eliminate illicit discharges.

In 2010, the LHD prepared an Illicit Discharge Detection Elimination ("IDDE") Program as part of their 2nd year permit requirements. This program also includes a spill response plan, illegal dumping procedures, and training for LHD Staff on how to respond to illicit discharges. The IDDE Program is available for review on their website at www.lakeshighwaydistrict.com.

In 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, and 2019 LHD performed Outfall Reconnaissance Inventory (ORI) within the MS4 based on the following minimum requirements defined in the 2010 IDDE Program:

- Visit outfalls within the designated area defined in the program a minimum of one time during the months of July and August.
- Note any observed color, odor, clarity, floating solids, foam, sheen, suspended or settled solids or other indicators of pollution.
- Perform additional water quality testing may also be warranted. If deemed necessary by the permit coordinator, obtain a sample kit from Accurate Testing Labs in Hayden or other approved source and sample for parameters identified.
- Compare background tests to dry weather sampling results, if water present during dry weather inspections.
- Prepare a technical memo identifying the following: Work Performed, Results from Water Quality Testing, Illicit Discharge Detected, Reported and Results

For documentation of the ORI work completed in 2019, refer to Appendix C. There were no illicit discharges found during 2019 outfall inspections.

Planned Activities for 2020 and beyond includes continued implementation of the IDDE Program Work Plan.

b.) Effectively Prohibit Non-Storm Water Discharges

In 2010, LHD implemented Resolution 2010-04 and the IDDE Program found on their website. These mechanisms define the jurisdictional authority and responsible agency for enforcement.

Future work includes continued implementation of the IDDE Program. Additionally, future work to address this permit requirement will include notifying the County Code Enforcement Officer, EPA and IDEQ for enforcement assistance if the District observes what it deems to be repeated violations of state surface water quality standards (IDAPA 58.01.02.200).

c.) Prohibit Non-Storm Water Flows

Known controls or conditions to prohibit non-storm water flows include:

Controls or Conditions	Description	Potential Issue
IDAPA 58.01.16.400 and Recommended Standards for Wastewater Facilities, Ch 30.38 – Sewer System Design	Require sewer systems to be designed to protect water supplies	Prohibits Cross Connections of Sewer and Storm Sewers.
IDAPA 58.01.03.004.05 Failing System	Requires owners of failing septic tanks to obtain a permit and repair the system.	Failing Septic tanks could cause surface discharge to a storm sewer system.
IDAPA 58.01.03.007 Septic Tank Design and Construction Standards	Specifies minimum requirements for design to prohibit failures	Improperly designed system could cause surface discharge to a storm sewer system.

The LHD will report any observed discharges that impact water quality within the MS4 whether the discharge is related to storm water or non-storm water flows. Observations will be reported to the County Code Enforcement Officer, EPA and IDEQ as previously mentioned in this report for inspection and enforcement. In 2016, there was one location identified as a possible illicit discharge (Outfall No. 10). The concern was reported to Kootenai County Code Enforcement, Panhandle Health, and IDEQ. The case was closed by IDEQ with flows identified as groundwater seeps. Observations during the 2019 ORI indicated a flow less than 5 gallons per minute of groundwater flows at this location with no unusual deposits, vegetation, or conditions.

Future work includes notifying the EPA of any new local controls or conditions placed on the types of non-storm water discharges. Work will also include continued inspections and notifications to the County and EPA through subsequent annual reports.

d.) Complete a Comprehensive MS4 Map

In 2010, LHD prepared a comprehensive MS4 Map to include jurisdictional boundaries, the location of District-owned or operated storm sewers, culverts, roads with ditches and other conveyances, the location of all known inlets and outfalls, points at which LHD's MS4 is interconnected with other potential MS4's, names and locations of all waters that receive discharges.

The LHD's MS4 map was originally posted to their website in 2010 and updated posting in 2011 and 2013. The 2011 update included updating outfall symbols and inclusion of an aerial photographic background.

LHD's consulting engineer began a comprehensive review of the MS4 Map in 2012. This review included mapping of roadside ditch flow directions in order that the District may better determine areas that contribute drainage to its outfalls. Inquiries were also made to EPA and the Army Corps of Engineers to determine the jurisdiction of Avondale Lake and other potential wetlands. The District's MS4 map was updated in 2013 and now provides a complete inventory of the outfalls within the District. The 2013 MS4 Map was attached and submitted to EPA in the 2013 Annual report and is located on their website.

No updates to the MS4 Map were made in 2014, 2015, 2016, 2017, 2018, or 2019.

Future work will include an ongoing investigation of 24 outfalls that have been identified for potential removal from the MS4 Map as "not" a point source discharge to waters of the US. The District anticipates final removal from the MS4 Map to occur once collaboration with EPA Region 10 is complete. This revised MS4 Map is anticipated to be included with the 2020 Annual Report.

e.) Begin an On-Going Education Program

LHD's on-going education is a coordinated effort with other area permit holders. In 2009, LHD began working with the City of Coeur d'Alene and Post Falls to televise a Public Service Announcement ("PSA") during the first permit year. The PSA informs the public of local storm water and erosion control issues. The PSA consists of 30 second advertisements prepared by the local Storm Water Erosion Education Program ("SEEP") and again these PSA's are now posted to www.lakeshighwaydistrict.com. As noted previously, a new PSA effort was being developed in collaboration with the City of Coeur d'Alene, the Post Falls Highway District, East Side Highway District, and the Boy Scouts of America, but did not materialize. An alternate effort has been successful through the University of Idaho. The new PSA video was recently approved for release and will be posted to the Lakes Highway District website as soon as possible.

As part of LHD's education program, staff attends annual Environmental Open Houses and area Watershed Association Meetings. Events such as these help LHD educate those who are interested in their programs. Refer to Appendix A for Public Outreach and Public Involvement documentation.

Planned Activities for 2020 and beyond include working with other local permit holders to develop and advertise PSA's. Additionally, Lakes Highway District will continue utilizing their website to inform the public regarding the need to eliminate Non-Storm water flows if they are determined to be a source of contaminants. A record of website hits is included in Appendix B.

Planned activities for 2020 also include an annual training program as identified in the IDDE Program for Highway District Employees to look for signs of illicit discharges.

f.) Begin Dry Weather Screening for Non-Storm water Flows from Outfalls

During the third permit year (2011) LHD began implementation of its Illicit Discharge Detection and Elimination System, Dry Weather Screening for non-storm water flows. This work was performed in accordance with LHD's IDDE Program Work Plan. Dry weather screening was performed in 2012 for the area identified in the Work Plan as South Hayden Lake, West of Half Miles Avenue, originally scheduled for 2014-2015. Additional dry weather screening was performed in 2013 for the Avondale Lake and South Hayden Lake areas. Water samples were collected from two separate services and analyzed for nutrients and contaminants. Sample results were negative. Dry weather screening was performed in 2014 for the Avondale Lake outfalls (50% of total outfall number). Dry weather screening was performed in the South Hayden Lake Road area in 2015. Dry weather screening was performed in the Avondale Lake area and the South Hayden Lake area in 2016. A water sample was collected from a location on East Hayden Lake Road. IDEQ closed the case and attributed the flows to groundwater seeps. Dry weather screening was performed in 2017 for all the outfalls in the district. The effort to inspect all of the outfalls accompanied the analysis for outfalls that may be misrepresented on the MS4 Outfall Map. Dry weather screening was performed in 2018 in the Avondale area, and included any outfalls from other areas that had flows in the previous year. Dry weather screening was performed in 2019 for all the outfalls in the Avondale area, and any outfalls that presented flows in the previous year. Refer to Appendix C for 2019 Dry Weather Screening documentation.

Planned Activities for 2020 include addressing non-storm water discharge through the MS4 System by continuing to screen outfalls during dry weather in accordance with the IDDE Program on a rotating basis. If flows are discovered during dry weather, LHD will analyze whether the flows are an "allowable non-storm water discharge" (i.e. groundwater, as described in Part I.C.1.c of the permit and Section 2.B.3.c of this report) or if it is suspect and requires laboratory testing to determine action to eliminate. LHD will provide the necessary means to expeditiously follow-up and eliminate such illicit discharges to the MS4.

g.) Inventory all industrial facilities

During the third permit year (yr. 2011) LHD determined through an analysis of issued permits that there is currently no industrial facilities located within the MS4 draining to Hayden Lake. No new industrial facilities were found within the MS4 boundaries during 2019.

Planned Activities for 2020 and beyond include providing necessary inventories, to include the point of discharge, for any industrial activity as defined by 40 CFR 122.26(b)(14)(i)-(xi) within the MS4.

4) Construction Site Storm Water Runoff Control

a.) Develop, Implement and Enforce Program to Reduce Pollutants in Storm Water Runoff to the MS4 for Construction Activities Conducted or Overseen by the Highway District

In 2009, Lakes Highway District through Resolution 2009-12 and again by Resolution 2010-4 has required all construction projects within the MS4 to be performed in accordance with the EPA Construction General Permit requirements.

Planned Activities for 2020 and beyond includes implementation of Resolution 2010-4. All work within Lakes Highway District Right-of-Way requires a permit. Special Conditions of this permit require contractors to comply with Resolution 2010-4.

b.) Provide Adequate Oversight and Direction to Contractors Working on Highway District Projects

The Lakes Highway District requires all construction projects within the District, whether performed by the District or under the supervisor of, to be in conformance with the EPA, Construction General Permit. Additionally, the Lakes Highway District requires that construction conform to the Associated Highway District Standards and the Kootenai County Site Disturbance Ordinance. The LHD is committed to provide sufficient resources to oversee and direct contractors on work within the MS4. Lakes Highway District tracks issued permits and location with respect to the MS4. Refer to Appendix B LHD's tracking log.

c.) Review and Update Existing Regulatory Mechanism

In 2009, LHD completed a review of existing policies. On December 22, 2009 the Board provided official direction to staff through Resolution 2009-12 that not only clarified existing District requirements, but also implemented new requirements for all work within the public right-of-way to be performed under the training of SEEP. Additionally, through Resolution 2009-12 LHD will report all non-storm water discharges to the County Code Enforcement Officer as a potential violation to the Kootenai County Site Disturbance Ordinance. In 2010, Resolution 2009-12 was updated as previously discussed in this report.

Planned Activities for 2020 and beyond include documentation of reporting to the County Code Enforcement Officer when required and providing written documentation as part of the Annual Report. Additionally, discussions are underway, and it is expected that NPDES MS4 Permit Conditions will be included in the upcoming revision to the Highway Standards for the Associated Highway District of Kootenai County.

d.) Publish and Distribute Local Requirements for Construction Site Operators to Implement Appropriate Erosion and Sediment Control

Efforts during the first permit year included publishing of the "North Idaho Storm Water Erosion & Sediment Control Field Guide". LHD provides SEEP Field Guides to interested public through office and to Construction Operators who are permitted to do work within LHD right-of-way.

Planned Activities for 2020 and beyond include distribution of the "North Idaho Storm Water Erosion & Sediment Control Field Guide" to all Contractors who obtain permits to work within Lakes Highway District's MS4 road right-of-way.

e.) Develop Procedures for Reviewing all Pre-Construction Site Plans for Potential Water Quality Impacts

Resolution 2010-4 requires construction site operators within road rights-of-way under the jurisdiction of Lakes Highway District to obtain a permit from the District. These permits are evaluated to ensure appropriate BMP's are in-place for site stabilization and to ultimately prevent storm water runoff. Work outside of the road right-of-way, under the jurisdiction of Kootenai County, requires individuals performing work to comply with Kootenai County Site Disturbance Ordinance No. 374. Lakes Highway District tracks issued permits and location with respect to the MS4. Refer to Appendix B for LHD's tracking log.

Planned Activities for 2020 and beyond include continued implementation of Resolution 2010-4 and review BMP's for work performed by permit in Lakes Highway District's Right-of-Way.

f.) Implement a Program to Receive, Track and Review Information Submitted by the Public Regarding Construction Site Erosion and Sediment Controls

In 2010, LHD began tracking public comments or inquiries concerning storm water related issues that are either received by phone or email. When an inquiry is received, Lakes staff log the date, address, contact information and description/reason for the call. A follow up comment is then posted concerning what response was given or results of an inspection performed regarding the call. All correspondence to/from this tracking log is documented in a three ring binder held in the District Office. Refer to Appendix B Lakes Highway District's Public Input tracking log.

Planned Activities for 2020 and beyond include continued updates, improvements and use of the established tracking log.

g.) Develop and Implement Procedures for Site Inspection and Enforcement Measures Established as Required in Part II.B.4.c and d of the Permit

In 2008, 2015, 2018, and again in 2019, the Lakes Highway District adopted the Highway Standards for the Associated Highway Districts of Kootenai County, Idaho. These standards provide procedures for design, construction operations and final construction acceptance (inspection) by the District. As part of the Districts 2010-04 Resolution and Illicit Discharge Detection and Elimination Program, the District will inspect construction sites that are permitted within the MS4 to ensure erosion control is in place during construction and that the construction site is clean. Violations will be documented and reported to the Kootenai County Code Enforcement Officer and/or EPA.

For construction performed in the development of private property, work must comply with the Kootenai County Site Disturbance Ordinance, which addresses compliance and enforcement of storm water and erosion control. Additionally, when called upon by the Kootenai County to review Site Disturbance Plans and other improvement plans within its MS4, the District will provide a review of the temporary erosion control measures in addition to its review for compliance with the Associated Highway District Standards (AHDS). The District is jointly considering adding language to the AHDS to address MS4 NPDES Permit Conditions in the forthcoming standards revisions.

The District will inspect construction sites during routine maintenance rounds to ensure that some level of erosion control is in place during construction and that any construction site storm water discharge is clean. Violations will be documented and reported to the Kootenai County Code Enforcement Officer and/or EPA.

Planned Activities for 2020 and beyond include continued implementation of procedures for site inspections for work within the road right-of-way. Enforcement shall be in accordance with the IDDE Program identified authority.

h.) Comply with the Construction General Permit and all Other Relevant Local Requirements for Erosion, Sediment and On-Site Materials Control on Public Construction Projects.

As specified in Resolution 2010-4, LHD is committed to complying with the CGP for construction projects.

5) Post – Construction Storm Water Management in New Development and Re-development

a.) Implement and Enforce Post-Construction Site Runoff from Developments

LHD does not have the authority over development needed to directly comply with this requirement. Kootenai County is the regulatory authority over developments and re-developments. Development is required to comply with the Kootenai County Site Disturbance Ordinance No. 374. Only at such time that a development is complete and finally stabilized will the Highway District consider accepting roads within a development.

Since LHD's authority is limited to road rights-of-way accepted into the District, future work on this item will include:

- The District will work with the County and other agencies where it is able, in keeping with the intent of the above requirements.
- When called upon by the County to review Site Disturbance Plans and other improvement plans within the Districts MS4, the District will provide a review of the erosion control plans in addition to review for compliance with the Associated Highway District Standards.
- Notify the County Code Enforcement Officer of site runoff from developments for enforcement under the Kootenai County Site Disturbance Ordinance No. 374.

- When appropriate, LHD will encourage the County to require drywells to ensure all runoff is retained on-site.

b.) Implement Policy to Address Post-Construction Site Runoff

In accordance with LHD Resolution 2010-04, LHD will notify the County Code Enforcement Officer of site runoff from developments for enforcement under the Kootenai County Site Disturbance Ordinance No. 374. When appropriate, LHD will encourage the County to require drywells to ensure all runoff is retained on-site.

c.) Ensure Proper Long Term Operation and Maintenance of Permanent Storm water Management Controls

Permanent storm water management controls outside of the road right-of-way are not within the regulatory authority of the Lakes Highway District. With respect to permanent storm water controls within the road right-of-way, acceptance of roads by the Board of Highway District Commissioners ensures funding of long-term operation and maintenance.

If new roads are accepted by the Lakes Highway District for maintenance, Lakes Highway District ensures proper long-term operation and maintenance of permanent storm water management controls within the road right-of-way under the jurisdiction of LHD.

d.) Develop and Implement Processes for Pre-Construction Plan Review of Permanent Storm Water Management Controls

The District's process for pre-construction plan review is as follows:

- When called upon by Kootenai County to review Site Disturbance Plans and other improvement plans within its MS4 areas, the District will provide a review of permanent storm water features in addition to its review for compliance with Associated Highway District Standards.
- Provide installation inspection of storm water controls for private projects within the right-of-way and those facilities off the right-of-way that discharge to its MS4s.
- Monitor private storm water facilities off the right-of-way that discharge to the MS4. Notify the owner and/or Kootenai County if the facility is not being maintained or is not functioning properly.

Lakes Highway District tracks issued permits and location with respect to the MS4. Refer to Appendix B LHD's tracking log.

Planned activities for 2020 and beyond include the continuation of plan reviews, inspections, and maintaining the tracking log.

6) Pollution Prevention and Good Housekeeping for Municipal Operations

a.) Develop and Implement an Operation and Maintenance Program

In 2010, LHD formalized an operations and maintenance plan for the operations facility on Ramsey Road. Refer to LHD's website for programs.

Planned activities for 2020 and beyond include continued implementation of the Operations and Maintenance Program.

b.) Develop and Conduct Appropriate Training for Personnel

In 2010 and 2011, LHD provided staff Municipal Storm Water Pollution Prevention Training (Storm Watch). In 2013, LHD hosted a joint training session which included the Post Falls Highway District. The training session included a presentation by the District's consulting engineer regarding MS4 areas and Illicit Discharge Detection and Elimination. This was followed by a video titled Rain Check: Storm water Pollution Prevention for MS4s and a question and answer session. LHD and PFHD jointly hosted Annual Staff Training on December 22, 2014. On December 11, 2015, a Storm Water Pollution Prevention Joint Training Session was provided to Lakes Highway District, Post Falls Highway District, and East Side Highway District staff at the Post Falls Highway District Shop Location. On November 29, 2016, Lakes Highway District hosted a joint Annual Staff Training for Lakes Highway District, East Side Highway District, and Post Falls Highway District staff. This training identified best management practices and identifying illicit discharges and incorporated the Rain Check learning videos. On December 14, 2017, Lakes Highway District hosted a joint Annual Staff Training for Lakes Highway District, Post Falls Highway District, and East Side Highway District staff. The training identified best management practices, good housekeeping practices, and illicit discharge detection and elimination practices. On December 07, 2018, Lakes Highway District hosted a joint Annual Staff Training for Lakes Highway District, Post Falls Highway District, and East Side Highway District staff. The training identified best management practices, good housekeeping practices, and illicit discharge detection and elimination practices. On December 18, 2019, Lakes Highway District hosted a joint Annual Staff Training for Lakes Highway District, Post Falls Highway District, and East Side Highway District staff. The training identified best management practices, good housekeeping practices, and illicit discharge detection and elimination practices. A list of attendees and a copy of the presentation is included in Appendix E.

Lakes Highway District supports SEEP training and certification of staff. A list of SEEP certified staff is included in Appendix E.

Planned activities for 2020 and beyond include continued yearly training related to optimum maintenance practices for the protection of water quality as a joint training session to all three Highway Districts, as well as continued SEEP training and certification of staff.

c.) Prepare a Storm Water Pollution Prevention Plan for the LHD Maintenance Yard

The Lakes Highway District Maintenance yard is located outside of the Coeur d'Alene Urbanized Area and MS4 Boundary. Therefore, action contained in Part II.B.6.c is not specifically required. No further action will be taken under this permit.

C. Discharges to Water Quality Impaired Receiving Waters

Refer to discussions in Part 2.B.1-6 of this annual report for details regarding how Lakes Highway District intends to control discharge of pollutants.

D. Reviewing and Updating the SWMP

The 2017 Construction General Permit (CGP) replaced the 2013 CGP in the SWMP binder in 2017. The District's Storm Water Management Program was reviewed internally in 2019 with no changes made.

E. Transfer of Ownership, Operational Authority, or Responsibility for SWMP Implementation

There are no new transfers of ownership, operational authority, or responsibility for SWMP implementation.

F. SWMP Resources

The Highway District is committed to providing the necessary funding for implementation the NPDES permit requirements as specified in Resolution 2009-12.

LHD will continue to provide the necessary resources and funding for implementation of the NPDES Permit requirements in 2020 and the years beyond.

