

# Lakes Highway District National Pollution Discharge Elimination System (NPDES)

NPDES Permit # IDS-028207

## 2014 Annual Report

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Permit Year: January 1, 2014– December 31, 2014



Lakes Highway District  
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Hayden, Idaho 83835  
(208) 772-7527

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**Appendix G: Not Used**



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January 14, 2015

LAKES HIGHWAY DISTRICT, NPDES MUNICIPAL SEPARATE STORM SEWER SYSTEM ("MS4")  
ANNUAL REPORT FOR PERMIT YEAR 2014

"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."

Lakes Highway District

A handwritten signature in black ink, appearing to read "Rodney A. Twete".

Rodney A. Twete, Board Chairman

January 19, 2015  
Date

This report identifies activities undertaken by the Lakes Highway District ("LHD") during the sixth (6th) permit year as required by Part II of the Lakes Highway District Municipal Separate Storm Sewer System ("MS4"), NPDES Permit (permit). The 2014 permit year, as defined in this report, covers the period between January 1, 2014 – December 31, 2014.

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 fifth (5<sup>th</sup>) 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 on a daily basis and are responsible for reporting potential illicit discharges, spills, storm water 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 Report	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 <b>Storm Water Erosion Education Program (SEEP)</b> .	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 storm water 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 2014 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 will inform the public of local storm water and erosion control issues. The PSA consists of 2-30 minute advertisements prepared by our local Storm Water Erosion Education Program ("SEEP"). In 2010 these PSA's were added to the District's website, [www.lakeshighwaydistrict.com](http://www.lakeshighwaydistrict.com).

In 2014 LHD together with Post Falls Highway District and the City of Coeur d'Alene, Idaho supported the development of a new PSA. Work on this PSA is currently ongoing and is expected to begin airing in mid-2015. This PSA will be added to the LHD website when it is finalized.

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, Chilco, Idaho	May 21 and 22, 2014
(RYA) member of local SEEP Coordination Group, IDEQ, Coeur d'Alene, Idaho	February, March 2014



Refer to **Appendix A** for the 2011, 2012, 2013 and 2014 Earth Day and Environmental Open House Flyers and sign-in sheets of attendees. This open house was sponsored by multiple local public agencies, including Lakes Highway District.

Planned Activities for yr. 2015 and beyond:

Continue working with other local permit holders to develop and advertise and develop new PSA's. Additionally, Lakes Highway District will continue utilizing our website to inform the public regarding the importance of storm water and erosion control BMP's. Continue 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](http://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. **Appendix F** includes one of these door hangers.

In the 2014 LHD in cooperation with the City of Coeur d'Alene and the Post Falls Highway District distributed "Storm Drain Dan" coloring books (Appendix A) through outreach programs with the City. LHD also distributed SEEP Field Guides in conjunction with approach and utility permit applications, and to citizens through their front office.

Planned Activities for yr. 2015 and beyond:

Distribute appropriate and relevant storm water information to employees, the public and business 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.

## ***2) Public Involvement and Participation***

In 2014 public outreach consisted of providing information through our website. LHD supported the Coeur d'Alene Area Multi-Jurisdiction Earth Day Fair and the Silverwood Physics and Science Environmental Classrooms. In addition, LHD supported the distribution of the "Storm Water Dan" coloring book to children in Kootenai County, see Appendix.

Planned Activities for yr. 2015 and beyond include continuation with similar outreach opportunities completed in 2014, and completion of the new Storm Water PSA through collaboration with the City of Coeur d'Alene, PFHD, and Boy Scouts of America

### 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 our 2<sup>nd</sup> 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 our website at [www.lakeshighwaydistrict.com](http://www.lakeshighwaydistrict.com).

In 2011, 2012, 2013, and 2014 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 Preformed, Results from Water Quality Testing, Illicit Discharge Detected, Reported and Results

Refer to **Appendix C** for documentation of the work completed in 2011, 2012, 2013 and 2014.

Planned Activities for yr. 2015 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 our 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 2013 and 2014 no reports or observations on prohibited or suspect storm water discharges were received or filed.

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 our 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 Districts 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.

Future work will include providing updates of the Districts MS4 Map as required to reflect any changes that occur.

#### ***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 will inform the public of local storm water and erosion control issues. The PSA consists of 2-30 minute advertisements prepared by our local Storm Water Erosion Education Program ("SEEP") and again these PSA's are now posted to [www.lakeshighwaydistrict.com](http://www.lakeshighwaydistrict.com). As noted previously a new PSA is being developed in collaboration with the City of Coeur d'Alene, the Post Falls Highway District and the Boy Scouts of America.

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 our programs. Refer to **Appendix A** for Public Outreach and Public Involvement documentation.

Planned Activities for yr. 2015 and beyond include working with other local permit holders to develop and advertise PSA's. Additionally, Lakes Highway District will continue utilizing our website to inform the public regarding the need to eliminate Non-Storm water flows if they are determined to be a source of contaminates.

Planned activities for 2015 also include a training program as identified in our 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). Refer to **Appendix C** for 2011-2014 Dry Weather Screening documentation.

Planned Activities beginning in the next permit year include addressing non-storm water discharge through our MS4 System. LHD will continue 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 or not 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 needs to be removed/eliminated. LHD will provide the necessary means to expeditiously follow-up and eliminate such illicit discharges for our MS4.

#### ***g.) Inventory all industrial facilities***

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

Planned Activities for 2015 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, LHD 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 yr. 2015 and beyond includes implementation of Resolution 2010-4. All work within LHD 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 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 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 yr. 2015 and beyond include documentation of reporting to the County Code Enforcement Officer 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 our office and also to Construction Operators who are permitted to do work within LHD right-of-way.

Planned Activities for yr. 2015 and beyond include distribution of the "North Idaho Storm water Erosion & Sediment Control Field Guide" to all Contractors who obtain permits to work within LHD'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 LHD 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 and 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 yr. 2015 and beyond include continued implementation of Resolution 2010-4 and review BMP's for work performed by permit in LHD Rights-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 implemented a separate email account that is use to assist with tracking public comments related to storm water. This email address is posted on our website for the public to directly notify staff at LHD. Additionally, this email account is used to notify staff of phone calls received regarding storm water related items and/or notifications to the County Code Enforcement Officer. All correspondence to/from this tracking log is documented on a form on the inside cover of a three ring binder held in the District Office. Refer to **Appendix B** LHD's tracking log.

Planned Activities for yr. 2015 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 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 yr. 2015 and beyond:

Implement 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 all 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 to, 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 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 Highway District for maintenance, LHD 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. Future work includes 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. Future work will 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 staff attended MS4 area, DPE training on December 4, 2013 and December 22, 2014.

Training acknowledgement is attached in **Appendix E**. Future work on this item will provide continued and appropriate training related to optimum maintenance practices for the protection of water quality.

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

The LHD 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 LHD intends to control discharge of pollutants.

## **D. Reviewing and Updating the SWMP**

The 2012 Construction General Permit (CGP) replaced the 2008 CGP in the SWMP binder in 2013. The SWMP changes were reported in the 2013 Annual Report. The District's Storm Water Management Program was reviewed internally in 2014 and no changes were 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 2015 and the years beyond.