

Stormwater Management Program

Written description as required by NPDES Permit #IDS028215



*City of Coeur d'Alene Stormwater Drainage Utility
Todd Feusier, Director
Chris Bosley, City Engineer
710 E. Mullan Avenue
Coeur d'Alene, Idaho 83814
www.cdaid.org*

Permit #IDS028215

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ACRONYMS

BMP's: Best Management Practices
CGP: Construction General Permit
EPA: United States Environmental Protection Agency
IDEQ: Idaho Department of Environmental Quality
IDDE: Illicit Discharge Detection and Elimination
IPDES: Idaho Pollutant Discharge Elimination System
MEP: Maximum Extent Practicable
MS4: Municipal Separate Storm Sewer System
NPDES: National Pollutant Discharge Elimination System
QAPP: Quality Assurance Project Plan
SWMP: Stormwater Management Program

DEFINITIONS

Best Management Practices, or BMP: measures implemented by private industry and public agencies that prevent or reduce water pollution.

CGP and/or Construction General Permit means the current available version of EPA's NPDES General Permit for Stormwater Discharges for Construction Activities in Idaho, Permit No. IDR12- 0000. EPA's CGP is posted on EPA's website at www.epa.gov/npdes/stormwater/cgp.

Maximum Extent Practicable (MEP): is the technology-based standards established by Congress in the Clean Water Act Section 402 that municipal discharges of stormwater must meet. Technology-based standards establish the level of pollutant reductions that dischargers must achieve. MEP is generally a result of emphasizing pollution prevention and source control BMPs as the first lines of defense.

MS4 means "municipal separate storm sewer system," and is used in this document to refer to 'Small Municipal Separate Storm Sewer System' as defined in 40 CFR 122.26(b)(16). The term, as used in the context of this Permit, refers to those portions of the municipal separate storm sewer systems owned and/or operated by the entities named herein.

Municipal Separate Storm Sewer is defined in 40 CFR §122.26(b)(8) and means a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains): (i) Owned or operated by a State, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to State law) having jurisdiction over disposal of sewage, industrial wastes, stormwater, or other wastes, including special districts under State law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under Section 208 of the CWA that discharges to waters of the United States; (ii) Designed or used for collecting or conveying stormwater; (iii) Which is not a combined sewer; and (iv) Which is not part of a Publicly Owned Treatment Works (POTW) as defined at 40 CFR §122.2.

National Pollutant Discharge Elimination System (NPDES) means the national program for issuing, modifying, revoking and reissuing, terminating, monitoring and enforcing permits, and imposing and enforcing pretreatment requirements, under sections 307, 402, 318, and 405 of CWA [40 CFR §122.2].

1 BASIC SWMP INFORMATION

The purpose of our Storm Water Management Program (SWMP) is to preserve, protect and improve local water resources from polluted storm water runoff.

This Storm Water Management Program (SWMP) Document was developed by the City of Coeur d Alene to describe the activities and control measures conducted to meet the terms and conditions of NPDES Permit #IDS028215 and designed to reduce the discharge of pollutants in storm water runoff.

Program Goals:

- Comply with Permit Requirements
- Evaluate Changes in Public Awareness and Behavior
- Evaluate Effectiveness of Specific Control Measures for Pollution Reduction
- Effectively Facilitate Public Input to the Stormwater Management Program

Staff Organization

<i>Steve Widmyer</i> <i>Dan Gookin</i> <i>Amy Evans</i> <i>Christie Wood</i> <i>Kiki Miller</i> <i>Dan English</i> <i>Woody McEvers</i>	<i>Mayor</i> <i>Councilmember</i> <i>Councilmember</i> <i>Councilmember</i> <i>Councilmember</i> <i>Councilmember</i> <i>Councilmember</i>
<i>Troy Tymesen</i>	<i>City Administrator</i>
<i>Todd Feusier</i>	<i>Streets & Engineering Director, Drainage Utility Administrator</i>
<i>Chris Bosley</i>	<i>City Engineer</i>
<i>Justin Kimberling</i>	<i>Field Supervisor</i>
<i>Kim Harrington</i>	<i>Assistant</i>

1.1 Receiving Waters

The waterbodies identified in Table 1 receive storm water discharges from the City of Coeur d Alene MS4.

Table 1 Receiving Water Summary

Receiving Waterbody Segments	WQS Classification	Impairment/Pollutant of Concern	TMDLs? (Yes/No)	Applicable WLAs (Yes/No)	No. of Discharging Outfalls
Spokane River	Category 5	Lead, Zinc, Total Phosphorus	No ¹	No	5
Coeur d Alene Lake	Category 5	Cadmium, Lead, Zinc, Total Phosphorus ²	No	No	8
Spokane River-WA portion downstream of ID/WA border	Category 4 for Total Phosphorus, PCB's unknown	Polychlorinated Biphenyls, Total Phosphorus	No	No	0

Footnotes:

1. Not as of 11/18/2021, Spokane River TMDL is soon to be submitted to EPA for approval.
2. Total Phosphorus is a concern but not in concentrations that impair beneficial uses.

The City of Coeur d Alene's MS4 is also interconnected with other MS4s as identified below.

Table 2 Idaho Transportation Department District 1 MS4 Permit #IDS028223 (Fernan Creek)

Receiving Waterbody Segments	WQS Classification	Impairment/Pollutant of Concern	TMDLs	Applicable WLAs	No. of Inter-connections
Fernan Creek	Category 4a	Temperature	Yes, 50345	Yes (PNV shade)	1

1.2 SWMP Information and Statistics

In accordance with regulatory requirements, the City of Coeur d Alene Drainage Utility's SWMP is specifically targeted to control stormwater pollutant discharges in the City of Coeur d Alene. The SWMP document contains the strategies taken to reduce stormwater runoff pollution into our waterbodies.

The following six minimum measures are included in the SWMP.

1. Public Education and Outreach
2. Public Involvement and Participation
3. Illicit Discharge Detection and Elimination
4. Construction Site Stormwater Management
5. Post Construction Site Stormwater Management in New and Redevelopment
6. Pollution Prevention/Good Housekeeping for Permittee Operations

Public Education and Outreach

It is important to make the public sufficiently aware about the significance of their behavior related to stormwater pollution and, through information and education, promote ways that they can change improper behaviors.

The City of Coeur d Alene will organize, partner and participate in events and classroom activities to provide stormwater pollution prevention information to general and targeted audiences. The outreach efforts will be tracked and recorded for annual reporting.

The discharge permit and annual reports are posted on the City of Coeur d Alene website.

Public Involvement and Participation

The City will provide opportunities for citizens to volunteer which includes litter pick up and storm drain stenciling as well as volunteer boards. The volunteer link is on the City's website as well as on-line storm water concerns reporting and a dedicated hot-line phone number. The number of inquiries and reports will be tracked and included with the annual report.

Illicit Discharge Detection and Elimination

Program Objectives:

- Control illicit discharges by conducting field surveys of the municipal storm drainage conveyance system and identifying and eliminating the source of non-stormwater discharges.
- Detect and eliminate illegal disposal of wastes to the storm drain system through a program that combines education, alternative disposal options, and enforcement.
- Effectively coordinate spill response and clean-up with existing programs.
- Optimize illicit discharge control activities through planning and prioritization.
- Partner with other agencies and groups to increase public awareness on how to effectively and efficiently prevent pollutant discharges to the storm drains.

The City of Coeur d Alene Drainage Utility performs video inspection of infrastructure to identify lateral intrusions and to assess maintenance needs. Additional methods utilized to locate the source of illicit discharges include: dry weather field screenings of outfalls, thorough inspections by trained staff, water sampling/testing, dye or smoke-testing buildings through coordination with the property owner, tracing the discharge upstream in the storm sewer.

Spills or reports of illegal dumping are investigated and appropriate measures taken. The amount of video and all other actions taken will be documented and included with the annual report. Citizen can report illicit discharges on our website or by calling our hot-line. The number of citizen reports will be tracked and included with our annual report.

Construction Site Stormwater Management

Stormwater management plan reviews are performed on all permit submittals. BMPs are required on site plans. BMP inspections are performed at a minimum, prior to site disturbance, after a rain event and upon project completion.

A notice to contractors in relation to CGP requirements is posted on our website.

The number of BMP inspections, plan reviews, corrections and enforcement actions are tracked and included in the annual report.

Post Construction Site Stormwater Management in New and Redevelopment

The City's Stormwater Management Ordinance sets forth strict requirements for post construction storm water management in new development and we have implemented standards and requirements for redevelopment projects. The purpose of these requirements is to reduce the amount of pollutants discharged from private developments.

The following are the highlights of the ordinance requirements:

- All new development is required to retain storm water runoff on-site, treat the runoff with approved best management practices and then discharge it to a shallow injection well.
- Vegetated swales and shallow injection wells or equivalent are the only allowed treatment at this time.
- Owners are required to operate and maintain their BMP's.
- Ground Disturbing activities are required to submit a storm water management plan for review and approval by the Engineering Department, prior to issuance of a building or site development permit.
- Prior to issuance of a Certificate of Occupancy, each development is inspected by the City and the Project Engineers are required to submit a letter of conformance to the plans and specifications. The number of plan reviews, certificates of occupancy, existing connections removed, and impervious area removed, will be tracked and documented in the annual report.

Pollution Prevention / Good Housekeeping for Permittee Operations

Many of the maintenance activities performed by the City have a direct or indirect impact on the water quality for storm water runoff covered under our discharge permit. The City has an evolving maintenance and operation plan that addresses processes and procedures meant to minimize the impact of our maintenance operations on water quality. These include:

- The use of sand and road de-icers
- Fleet maintenance and vehicle washing operations
- Street cleaning and maintenance repairs
- Grounds, Park, and open space maintenance operations
- Building maintenance
- Storm water system maintenance
- Snow disposal site operation and maintenance
- Materials storage and secondary containment

In addition to identifying processes and procedures, there is a training component designed to familiarize the appropriate staff with these required maintenance procedures. Training is conducted annually. Data such as the number and type of maintenance repairs completed, number of catch basins, drywells and manholes cleaned, tons of debris collected and lane miles swept is tracked and documented in the annual report.

1.3 Transfer of Ownership, Operational Authority, or Responsibility for SWMP Implementation

In the event through annexation or other circumstances, this stormwater management plan will be updated to reflect such areas added within the MS4 boundaries.

2 MAP OF THE SEPARATE STORM SEWER SYSTEM

Our existing MS4 infrastructure and drainage basin maps are included in the stormwater management plan as attachments I and II.

The MS4 mapping will be evaluated and updated for submittal with the 2022 annual report.

3 TARGETING POLLUTANTS OF CONCERN

Stormwater Outfall Volume Reduction Program was established to target all stormwater pollutants by removing the discharges from direct injection into surface waters. The city also performs aggressive street sweeping and catch basin cleaning in hard pipe areas that lead to outfalls to reduce the amount of all stormwater pollutants.

City wide Leaf Pick-up program helps to reduce Total Phosphorus.

3.1 Monitoring/Assessment of MS4 Discharges to Impaired Waters

The City of Coeur d Alene will develop a stormwater monitoring plan and methods to quantify pollutant removal as required in our discharge permit to be included in our stormwater management plan no later than October 1, 2022. Quality Assurance Project Plan will be updated during permit year 2 and submitted with annual report and posted on website.

<p><i>Submit a Monitoring/Assessment Plan See Part 2.6, and Part 4.</i></p>	<p>October 1, 2022</p>									
<p><i>Conduct Monitoring/Assessment Activity No later than October 1, 2022, and pursuant to Part 2.6 (Alternative Control Measure Requests) the Permittee must submit the Monitoring/Assessment Plan and the description of Pollutant Reduction Activities specified in Parts 4.2 and 4.3 below.</i></p> <table border="1" data-bbox="349 1129 1096 1291"> <thead> <tr> <th data-bbox="349 1129 836 1186">Location(s)</th> <th data-bbox="836 1129 1047 1186">Pollutant Parameter</th> <th data-bbox="1047 1129 1096 1186">F</th> </tr> </thead> <tbody> <tr> <td data-bbox="349 1186 836 1239"><i>Coeur d'Alene MS4 Discharges into Spokane River</i></td> <td data-bbox="836 1186 1047 1239"><i>Lead, Zinc, Total Phosphorus</i></td> <td data-bbox="1047 1186 1096 1239">At lea samp calen</td> </tr> <tr> <td data-bbox="349 1239 836 1291"><i>Coeur d'Alene MS4 Discharges into Coeur d'Alene Lake</i></td> <td data-bbox="836 1239 1047 1291"><i>Cadmium, Lead, Zinc, Total Phosphorus¹</i></td> <td data-bbox="1047 1239 1096 1291"></td> </tr> </tbody> </table>	Location(s)	Pollutant Parameter	F	<i>Coeur d'Alene MS4 Discharges into Spokane River</i>	<i>Lead, Zinc, Total Phosphorus</i>	At lea samp calen	<i>Coeur d'Alene MS4 Discharges into Coeur d'Alene Lake</i>	<i>Cadmium, Lead, Zinc, Total Phosphorus¹</i>		<p>April 3, 2025</p>
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The monitoring assessment plan and QAPP will be updated and submitted no later than October 1, 2022.

[No later than 180 days prior to the expiration date, the city will revise this section to include a general overview of the results of the monitoring/assessment activity to date.]

3.2 Pollutant Reduction Activities

Pollutant Reduction Activity #1

Goal: Reduce the amount of stormwater that directly injects to surface waters.

Stormwater Outfall Volume Reduction Program: The Stormwater Outfall Volume Reduction Program was created to evaluate the watershed within our MS4 boundaries and develop solutions to reduce the amount of stormwater runoff that direct injects into our surface waters.

During this permit year, we have successfully removed approximately 210 acres of commercial and residential urban stormwater runoff by diverting flows into an infiltration basin.

This program will continue throughout the permit period with other areas within our MS4 being evaluated for stormwater outfall volume reduction opportunities.

Pollutant Reduction Activity #2

Goal: Reduce the amount of trash, pet waste and other contaminants through education and outreach activities.

The City will provide educational opportunities, collaborative signage and outreach events to inform the community of the effects of these pollutants in our stormwater with an emphasis on the downtown core of our MS4.

4 LEGAL AUTHORITY AND ENFORCEMENT

The City of Coeur d’Alene relies on the following legal authorities.

1. To prohibit and eliminate illicit discharges to the MS4:	<p>The City of Coeur d’Alene has enacted Chapter 13.30 of the Title 13 of the Municipal Code. The purpose of this Chapter is to require implementation of stormwater management techniques which rely upon natural on-site treatment and recycling of stormwater as opposed to collection and conveyance of untreated stormwater into groundwater sources or into surface bodies of water. [13.30.010] The Chapter applies to all land disturbing activities including, but not limited to, grading, site development, parking lot paving, or street improvement [13.30.030(A)], and requires the development of a comprehensive stormwater management plan approved by a qualified, licensed professional (except in the case of new single-family residential structures which need not be designed by a licensed professional) and submitted to the City for review. [13.30.040(A)] The Chapter also requires that all activities subject to the requirements of the Chapter be carried out in a manner that ensures that runoff of storm or other natural surface waters shall not be accelerated, concentrated, or otherwise conveyed beyond the exterior property lines or project boundaries of the project in question. [13.30.050] No building permit, final plat approval, or other discretionary approval may be granted until the stormwater management plan has been approved by the City. [13.30.070(A)] No building permit will be issued for new subdivisions until the stormwater management system has been constructed for the developed portion and will accept the flow of stormwater as designed. In all other cases, no certificate of occupancy will be issued until the stormwater management system has been installed and will accept the flow of stormwater as designed. [13.30.070(B)] Sites are required to undergo and pass a City inspection upon completion of the installation of temporary erosion, sediment and construction waste controls, and upon completion of the final grading and/or the permanent drainage and erosion control facilities. [13.30.080(B)] The owner of the property is responsible to maintain all stormwater system elements required for on-site stormwater collection and treatment and the owner of the abutting property is responsible for maintaining infiltration basins contained within City rights-of-way or drainage easements for street drainage. Any violation of these maintenance requirements constitutes a violation of the Chapter which is a misdemeanor. [13.30.100(A) and (B), 13.30.110] The City can also, by civil action, compel completion, performance, and maintenance of the facilities installed under this Chapter. [13.30.120]</p>
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	<p>Pursuant to Chapter 13.32 of Title 13, the City prohibits direct or indirect discharge of nonstormwater to the drainage system except where such discharges satisfy one of three (3) conditions. <i>i.e.</i>, related to a separate NPDES permit, related to unusual and severe weather events, and certain specified uncontaminated water. [13.32.070] The City also prohibits the construction, use, maintenance, or continued existence of illicit connections to the drainage system. [13.32.080] Monitoring of all facilities that have stormwater discharges associated with commercial, industrial activity and/or construction activity is mandated [13.32.110], as is notification of spills [13.32.120]. A violation of Chapter 13.32 of Title 13 is a misdemeanor [13.32.130] and violators may also be subject to federal sanctions [13.32.140].</p> <p>Chapter 35 of Title 13 establishes a system to enforce regulations and implement programs necessary and/or convenient to comply with the requirements of the City's NPDES discharge permit, and to provide the rules governing collection, treatment, detention and disposal of stormwater over the Spokane Valley-Rathdrum Prairie Aquifer. [13.35.020(D)] To further this purpose, the City has created a drainage system utility which is charged with administering and enforcing the City's stormwater management, illicit discharge, and drainage system connection ordinances. [13.35.050] Fees are charged to property owners and/or developers in accordance with the costs of the operation and maintenance of the City's system, including administrative, regulation, and enforcement costs, and for any redemption of bonds that are used to finance any system improvement. [13.35.080]</p> <p>The authority of the City to enact the foregoing Chapters of Title 13 is derived from Article XII, section 2, of the Idaho Constitution, and Idaho Code §§ 50-301 and 50-333.</p>
<p>2. To control the discharge of spills, dumping or disposal of materials other than storm water to the MS4:</p>	<p>Chapter 13.32 of Title 13 of the Municipal Code provides rules to control the discharge of spills. The purpose of this Chapter is to comply with the requirements of the City's NPDES permit, the federal clean water act, and to provide for the health, safety, and general welfare of the citizens of Coeur d'Alene through the regulation of nonstormwater discharges to the drainage system as required by federal and state law. This Chapter regulates the contribution of pollutants to the drainage system by stormwater discharges by any user, prohibits illicit connections and discharges to the drainage system, establishes legal authority to carry out all inspection, surveillance and monitoring procedures necessary to ensure compliance of this chapter, and establishes penalties associated with violations of this chapter. [13.32.020]</p> <p>The City prohibits direct or indirect discharge of nonstormwater to the drainage system except where such discharges satisfy one</p>

	<p>of three (3) conditions, <i>i.e.</i>, related to a separate NPDES permit, related to unusual and severe weather events, and certain specified uncontaminated water. [13.32.070]</p> <p>The City prohibits illicit connections to the system. [13.32.080] A person is considered to be in violation of this Chapter if the person connects a line conveying sewage or other nonstormwater discharges to the drainage system, or allows such a connection to continue, without written approval from the City. [13.32.080(C)]</p> <p>The drainage system utility administrator is permitted to enter and inspect facilities subject to regulation under this Chapter as often as may be necessary to determine compliance with this Chapter. Facility operators must allow the administrator ready access to all parts of the premises for the purposes of inspection, sampling, and examination and copying of records that must be kept under the conditions of an NPDES permit to discharge stormwater. In addition, the City has the right to require the discharger to install monitoring equipment as necessary. [13.32.110(B)] This Chapter also requires the facility operator to notify the City of any spills as soon as information is available and the facility must take all necessary steps to ensure the discovery, containment, and cleanup of such release. The facility must immediately notify emergency response agencies and the Idaho department of environmental quality of the occurrence via emergency dispatch services. [13.32.120]</p>
<p>3. To control the discharge of storm water and pollutants from land disturbance and development, both during the construction phase and after site stabilization has been achieved:</p>	<p>Chapter 13.30 of the Title 13 of the Municipal Code requires the development of a comprehensive stormwater management plan approved by a qualified, licensed professional (except in the case of new single-family residential structures which need not be designed by a licensed professional) and submitted to the city for review for all land disturbing activities including, but not limited to, grading, site development, parking lot paving, or street improvement. [13.30.040(A)] The Chapter requires that all activities subject to the requirements of the Chapter be carried out in a manner that ensures that runoff of storm or other natural surface waters shall not be accelerated, concentrated, or otherwise conveyed beyond the exterior property lines or project boundaries of the project in question. [13.30.050] No building permit, final plat approval, or other discretionary approval may be granted until the stormwater management plan has been approved by the City. [13.30.070(A)] No building permit will be issued for new subdivisions until the stormwater management system has been constructed for the developed portion and will accept the flow of stormwater as designed. In all other cases, no certificate of occupancy will be issued until the stormwater management system has been installed and will accept the flow of stormwater as designed. [13.30.070(B)] Sites are required to undergo and pass a City inspection upon completion of the</p>

	<p>installation of temporary erosion, sediment and construction waste controls, and upon completion of the final grading and/or the permanent drainage and erosion control facilities.</p> <p>[13.30.080(B)] The owner of the property is responsible to maintain all stormwater system elements required for onsite stormwater collection and treatment and the owner of the abutting property is responsible for maintaining infiltration basins contained within City rights-of-way or drainage easements for street drainage. Any violation of these maintenance requirements constitutes a violation of the Chapter which is a misdemeanor. [13.30.100(A) and (B), 13.30.110] The City can also, by civil action, compel performance and completion of, and maintenance of, the facilities installed under this Chapter. [13.30.120]</p>
<p>4. To control the contribution of pollutants from on MS4 to another interconnected MS4:</p>	<p>Chapter 13.20 of Title 13 provides the uniform requirements for users of the City’s POTW. [13.20.1.1] A “user” is defined as a source of the introduction of pollutants into the POTW from any nondomestic source. [13.20.1.3] The regulations govern prohibited discharges, pretreatment standards, local limits, permitting, etc. Any interconnected MS4 would be required to comply with these regulations.</p>
<p>5. To require local compliance with such requirements:</p>	<p>Enforcement provisions are found throughout Title 13. 13.20.9 provides for administrative enforcement of the uniform wastewater requirements, while 13.20.10 provides for judicial enforcement. 13.30.120 provides for enforcement of stormwater management ordinances and regulations. 13.32.130 provides for enforcement of illicit discharge and drainage system ordinances and regulations.</p>
<p>6. To carry out all inspection, surveillance, and monitoring procedures necessary to determine compliance and non-compliance with the Permit.</p>	<p>Any new or existing building, improvement, or structure of any type receiving water from the City public water system must be open, at all reasonable times, to inspections by the City Water Superintendent. [13.24.050] All construction activities which require a permit or have the potential to impact stormwater discharge or create a discharge to the stormwater collection system are subject to the inspection provisions of this section and, upon completion of the installation of temporary erosion, sediment and construction waste controls, and upon completion of the final grading and/or the permanent drainage and erosion control facilities, sites must pass a City inspection. Additional inspections may also occur as deemed necessary by the City. [13.30.080] And 13.32.110 provides for monitoring of discharges from facilities that have stormwater discharges associated with commercial, industrial, and construction activities. This section requires such facilities to admit the drainage utility administrator for purposes of inspection. Records must be made available for inspection with respect to the uniform wastewater requirements. [13.20.4.10]</p>

5 STORM WATER CONTROL MEASURES TO REDUCE POLLUTANTS TO THE MAXIMUM EXTENT PRACTICABLE

The following sections describe The City of Coeur d Alene's program to reduce pollutants in the MS4 discharges to the maximum extent practicable, as required by Permit Part 3. Each section summarizes the mandatory program, and describes how the City of Coeur d Alene meets each program component.

5.1 Construction Site Runoff Control

To control the discharge of storm water and pollutants from land disturbance during the construction phase **the City of Coeur d Alene** will:

Require appropriate erosion, sediment, and waste management provisions for construction site activities that results in land disturbance of 5,000 square feet or more.

Establish installation and use guidelines for required erosion/sediment/waste management during all phases of construction site activity. The City has adopted and implemented an ordinance requiring construction site operators to implement measures to control these elements at their construction sites. Sediment and erosion control requirements are noted in building permits, site development permits, and ground disturbance permits issued by the City. They are also detailed in the City's Standard Drawings for construction.

At a minimum, review preconstruction site plans for construction sites that will result in land disturbance of one (1) or more acres, using a checklist or similar process to consider and address potential water quality impacts from the site activities. Public works inspectors and the City Engineer review site development and ground disturbance permit applications to ensure sediment and erosion control measures are identified. A grading plan with topographic information is required to verify direction of flow and potential areas of concern.

Inspect and enforce erosion, sediment, and waste management requirements on construction sites. Public works inspectors visit construction sites periodically throughout the year to ensure that sediment and erosion control measures are in place and meet requirements. Inspection of construction sites are performed at least once per construction season to ensure placement and proper functioning of required erosion control elements. Our city track database program allows us to receive and track public complaints related to storm water.

Establish an inspection prioritization plan: large ground disturbing projects receive periodic visits. Projects that have received correction notices are visited periodically to ensure corrections are made and maintained. Factors such as project type, total area of disturbance, location and potential threat to water quality are used to prioritize inspections.

Establish an enforcement response policy, Contractors found in violation of sediment and erosion control requirements are issued correction notices. Violations not corrected upon the inspector's return may be issued a reinspection fee. Continued violations may result in a stop work order.

Ensure that Permittee staff is trained to conduct these activities. Public works inspectors complete training through the University of Idaho's Sediment and Erosion Education Program (SEEP) and are recertified every three years at a minimum.

Enforcement response flowchart. (Attachment III)

5.2 Storm Water Management for Areas of New Development and Redevelopment

To control the discharge of storm water and pollutants from land disturbance and development, after construction is completed, **The City of Coeur d Alene** will require:

- All new development is required to retain storm water runoff on-site, treat the runoff with approved BMP's.
- Grassed swales are the only allowed treatment at this time.
- Owners are required to operate and maintain their BMP's.
- Each development is required to submit a storm water management plan for review and approval by the Engineering Department, prior to issuance of a building or site development permit.
- Prior to issuance of a Certificate of Occupancy, each development is inspected by the City and the Project Engineers are required to submit a letter of conformance to the plans and specifications.
- Periodically inspect "high priority" permanent storm water controls for proper installation and operation, using an inspection prioritization system.
- Maintain an inspection prioritization plan and enforcement response policy.
- Ensure the appropriate staff are trained to conduct these activities.

The number of plan reviews, certificates of occupancy, existing connections removed, and impervious area removed, will be tracked and documented in the annual report.

5.3 **Pollution Prevention/Good Housekeeping for MS4 Operations**

Many of the maintenance activities performed by the City have a direct or indirect impact on the water quality for storm water runoff covered under our discharge permit. The City has an evolving maintenance and operation plan that addresses processes and procedures meant to minimize the impact of our maintenance operations on water quality. These include:

- The use of sand and road de-icers
- Fleet maintenance and vehicle washing operations
- Street cleaning and maintenance repairs
- Grounds, Park, and open space maintenance operations
- Building maintenance
- Storm water system maintenance
- Snow disposal site operation and maintenance
- Materials storage
- Spill Prevention and Response

In addition to identifying processes and procedures, there is a training component designed to familiarize the appropriate staff with these required maintenance procedures.

Data such as the number and type of maintenance repairs completed, number of catch basins and manholes cleaned, tons of debris and dirt cleaned, lane miles swept are tracked and documented in the annual report.

5.4 Illicit Discharge Detection and Elimination

Illicit discharge, detection and elimination (IDDE) is an important part of the overall SWMP and is a requirement of the discharge permit. The goal of IDDE is to detect, remove and prevent illicit connections, discharges, and improper disposal, including spills, into the storm water system, thereby reducing pollutant discharge. Our IDDE program contains the following elements.

Storm water collection system inventory and mapping.

The City will annually update the map of the storm water drainage system. This includes all the City owned and operated storm sewers, culverts, ditches, and other conveyances, inlets, outfalls (including diameter and latitude and longitude), connection points with other systems, and all City maintenance and storage facilities. The map is available in digital format.

Prohibition of non-storm water discharges.

The City has adopted an ordinance that prohibits non-storm water discharges into the stormwater collection system. The ordinance includes enforcement procedures and penalties for violations. It lists the types of discharges that are permitted and which are not.

Discharge detection and elimination program.

The City has developed a program to detect and eliminate illicit discharges into the storm water conveyance system. The program has several components including the following;

- Procedures for detection, source identification, and removal of illicit discharges
- Training for City staff on proper response to reports of illicit discharges
- Procedures for addressing illegal dumping into the storm water system
- Prioritizing reports of illegal dumping and spills
- Procedures for response to spills
- Use of “city track” database management system to track actions

Public Education.

Informing and educating the public about the hazards associated with illegal discharges is another component of the IDDE program. This includes public employees, businesses, students and the general public. The City will regularly develop public service announcements, press releases, flyers, and other methods to inform the public.

Dry weather outfall screening.

Screening of the outfalls during periods of dry weather is another component of the IDDE program. This will facilitate detection of non-storm water discharges. Field tests for selected parameters will be performed on outfall discharges. Because these tests are simple indicators of illicit discharges, it is not necessary to follow the same rigorous procedures as the storm water sampling. Our outfalls are screened annually. Any illicit discharges will be investigated within 15 days of detection and action taken by the City to eliminate the discharge within 45 days of detection.

Inventory of industrial discharges.

Industrial facilities that discharge into the storm water collection system or into Lake Coeur d’Alene or the Spokane river are required to obtain a separate Industrial Discharge Permit from the EPA. As part of the IDDE program, these facilities have been inventoried and the status of their permits verified. This information was forwarded to the EPA in the Annual Report. The effectiveness of the program is measured by collecting and tracking the data for each portion (i.e., number of illegal connections removed, complaints received, type and number of materials distributed, etc.) and documenting these in the annual report.

5.5 Education, Outreach, and Public Involvement

The **City of Coeur d'Alene** will conduct an ongoing education, outreach, and public involvement program to educate and involve members of the public to learn about pollutants in stormwater and how to prevent them.

The City of Coeur d'Alene has developed and implemented a public education and outreach program. The different program components are customized to educate target groups within the community about the impacts of storm water discharges on local water bodies and the steps that citizens and businesses can take to reduce pollutants in storm water runoff.

Key components of this program include the following:

- Research and develop educational and outreach partnerships with other local, state and private agencies
- Articles on line and in local newspapers
- Periodic press releases highlighting relevant storm water prevention activities
- Providing flyers and brochures to the public
- Distributing educational materials to the local schools
- Providing pollution prevention presentations to elementary schools
- Showing educational videos on the Cities public television channel
- Making all education materials available on the City's website
- Education and outreach have targeted the following audiences and subjects:
 - 1) General Public
 - Impacts of storm water discharges into local water bodies
 - Impacts from impervious surfaces
 - Best management practices (BMP's) and environmental stewardship actions relating to pet waste, vehicle maintenance, and application of pesticides, herbicides, and fertilizers.
 - 2) Businesses
 - Proper BMP's relevant to the individual business
 - Impacts of illicit discharges
 - 3) Developers, Engineers, Contractors.
 - Standards for storm water and erosion control plans
 - Low impact development techniques
 - Maintenance of BMP's

Public education and outreach activities, such as the type and amount of materials distributed, the number and nature of complaints, will be tracked and documented in the annual report.

Public involvement in stormwater management can provide a sense of ownership and responsibility for the health of the watershed. The City's SWMP includes ongoing opportunities for public involvement through stewardship programs, environmental activities, and other similar activities. These programs and activities target the general public and include the following:

- Volunteer Opportunities
- Organize and promote an Adopt a Street and Promotion of Litter Pickup Day
- Maintaining a telephone hotline and tracking complaints, provide on line reporting
- Organize and conduct a storm drain stenciling program and track results

The City will make the SWMP, annual reports, and all other submittals required by the discharge permit available on its website. Data such as the number of groups participating and the number of events, amount of debris collected, complaints received, action taken, and the number of forums conducted will be included in the annual report.

6 UNIQUE PROVISIONS SPECIFIC TO THE CITY OF COEUR D ALENE

6.1 Annual Compliance Evaluation

The discharge permit, stormwater management plan and annual reports will be made available to the public on our website, www.cdaid.org or may be requested by calling (208)769-2214. Annual reports will be electronically and by United States Postal Service mailing submitted to Idaho Department of Environmental Quality and the United States Environmental Protection Agency.

ATTACHMENT III Construction Site Enforcement Response Flowchart

