

ATTACHMENT A

SUMMARY OF PROPOSED QLP STORMWATER MANAGEMENT ACTIVITIES

The Lake County Stormwater Management Commission (SMC) serves as a Qualifying Local Program (QLP) for Municipal Separate Storm Sewer Systems (MS4s) in Lake County. As a QLP, SMC has been working since the early 2000's, when the Illinois Environmental Protection Agency (IEPA) began the process of expanding its NPDES Stormwater Program to include small MS4s, to assist Lake County MS4s in developing and implementing efficient and effective stormwater management programs.

Although SMC is not itself an MS4, as it does not own or operate a separate storm sewer system, it does perform activities related to each of the six minimum control measures (MCMs) described in IEPA's General NPDES Permit No. ILR40. Please note that the current version of IEPA's General NPDES Permit No. ILR40 (Permit) is scheduled to expire on March 31, 2014, and that the new version of the Permit, under which coverage is currently being sought through the submittal of this Notice of Intent (NOI), has not yet been released to the public. Although it is difficult to predict the changes that IEPA will make to the new version of the Permit, SMC remains committed to performing activities related to the six MCMs described in the current version of the Permit. Following the expiration of the current version of the Permit on March 31, 2014, SMC plans to continue to perform a variety of stormwater management activities, as described in more detail below.

A. Public Education and Outreach

SMC will continue to support Lake County MS4s in the development and implementation of their stormwater management programs by performing activities related to the Public Education and Outreach MCM, as described below.

A.1 Distributed Paper Material

SMC compiles, develops, and distributes throughout Lake County a variety of materials related to stormwater management. SMC has produced a number of pamphlets and brochures related to stormwater management and prepares a quarterly newsletter, "Mainstream," as well as an Annual Report, which highlight successful stormwater management activities conducted throughout Lake County. SMC also prepares project fact sheets that provide information about ongoing and recently completed stormwater management projects. In addition, SMC has developed or collaborated on a number of manuals related to stormwater management, such as "Riparian Areas Management: A Citizen's Guide," "A Citizen's Guide to Maintaining Stormwater Best Management Practices," and the "Streambank Stabilization Manual," and will continue to develop or collaborate on such manuals or manual updates on an as-needed basis.

Measurable Goal(s): *Distribute informational materials from "take away" rack at SMC.
Upon request, distribute informational materials directly to Lake County
MS4s for local distribution.*

Milestone(s): *SMC began implementation of this BMP in March 2003 and will continue to
implement it on an annual basis.*

A.2 Speaking Engagement

SMC provides educational presentations related to IEPA's NPDES Stormwater Program on a regular basis at Municipal Advisory Committee (MAC) meetings. Upon request, SMC will provide educational presentations related to IEPA's NPDES Stormwater Program to Lake County MS4s.

*Measurable Goal(s): Provide educational presentations related to IEPA's NPDES Stormwater Program at MAC meetings.
Upon request, provide educational presentations related to IEPA's NPDES Stormwater Program (e.g., "The Big Picture: Water Quality, Regulations & NPDES") to Lake County MS4s.*

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

A.3 Public Service Announcement

A public service announcement related to IEPA's NPDES Stormwater Program will be included in SMC's quarterly newsletter, "Mainstream," at least once each year. SMC will coordinate with the Lake County Department of Transportation (LCDOT) to post watershed identification signage in watersheds where watershed planning or project implementation efforts have occurred or are occurring.

Measurable Goal(s): Include public service announcement related to IEPA's NPDES Stormwater Program in its quarterly newsletter, "Mainstream," at least once each year. Post watershed identification signage in cooperation and collaboration with LCDOT.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

A.4 Community Event

SMC regularly sponsors and co-sponsors educational and technical training workshops on a variety of stormwater management-related topics. Each year, SMC will sponsor or co-sponsor at least one workshop on a topic related to IEPA's NPDES Stormwater Program, such as soil erosion and sediment control, illicit discharge detection and elimination, or stormwater best management practices (BMPs) that can be used to protect and improve water quality.

Measurable Goal(s): Sponsor or co-sponsor workshop on a topic related to IEPA's NPDES Stormwater Program.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

A.5 Classroom Education Material

Upon request, SMC will contribute to the development and compilation of materials for inclusion in a stormwater education kit that can be distributed to local students and teachers and/or other local stakeholders. Additionally, upon request, SMC will provide information, materials, and training to local students and teachers and/or other local stakeholders interested in conducting storm drain stenciling.

Measurable Goal(s): Upon request, develop and compile materials for inclusion in a stormwater education kit.
Upon request, provide information, materials, and training to local students teachers and/or stakeholders interested in conducting storm drain stenciling.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

A.6 Other Public Education

SMC maintains a website that contains a variety of materials and resources related to stormwater management. The website includes webpages such as "National Pollutant Discharge Elimination System Stormwater Program," "Best Management Practices," "Projects," "Publications," "Watershed Management Plans," "Partnerships," and "Advisory Committees." These webpages provide information about IEPA's NPDES Stormwater Program, provide information about stormwater best management practices (BMPs), allow for download of stormwater management-related publications and documents, provide notices of upcoming meetings and ongoing projects, and provide links to a number of other stormwater management-related resources.

Measurable Goal(s): Maintain and update the portion of the SMC website dedicated to IEPA's NPDES Stormwater Program with resources such as model ordinances, case studies, brochures, and links.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

B. Public Participation/Involvement

SMC will continue to support Lake County MS4s in the development and implementation of their stormwater management programs by performing activities related to the Public Participation/Involvement MCM, as described below.

B.3 Stakeholder Meeting

SMC is actively involved in watershed planning throughout Lake County. SMC believes that the watershed planning process cannot happen and will not be successful without the input, interest, and commitment of the watershed stakeholders. Watershed stakeholders may include municipalities, townships, drainage districts, homeowner associations, lakes management associations, developers, landowners, and local, county, state, and federal agencies.

Measurable Goal(s): Provide notice of stakeholder meetings on SMC website.
Track number of watershed committee meetings conducted.
Establish watershed planning committees for each new watershed planning effort.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

B.4 Public Hearing

SMC coordinates and conducts public meetings as well as committee meetings that are open to the public. A monthly Stormwater Management Commission meeting is open to the public and involves the SMC Board of Commissioners, which includes six municipal representatives and six county board members.

The Technical Advisory Committee (TAC) was created in 1992 to assist in the development, review, and revision of the Watershed Development Ordinance (WDO) and the associated administrative policies and procedures. TAC is made up of representatives from the development, environmental, municipal, and consulting engineering fields. TAC meetings are held monthly or on an as-needed basis.

The Municipal Advisory Committee (MAC) is made up of municipal, township, drainage district, consulting firm, and county representatives. MAC has worked to discuss, coordinate, and collaborate on the implementation of IEPA's NPDES Stormwater Program. MAC will continue to meet quarterly or as needed to assist Lake County MS4s with the implementation of IEPA's NPDES Stormwater Program.

The Watershed Management Board (WMB) meets annually to make recommendations on stormwater BMP project funding. WMB members include chief municipal elected officials, township supervisors, drainage district chairs, and county board members from each district within each of Lake County's four major watersheds.

*Measurable Goal(s): Provide notice of public meetings on SMC website.
Track number of meetings conducted.*

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

B.6 Program Involvement

Consistent with Lake County's comprehensive, countywide approach to stormwater management, SMC serves as a Qualifying Local Program (QLP) for all Lake County MS4s. In this role, in 2002, SMC proactively formed the Municipal Advisory Committee (MAC) to provide a forum for representatives of local MS4s, which include municipalities, townships, and drainage districts, to discuss, among other topics, the implementation of IEPA's NPDES Stormwater Program. SMC will continue to facilitate quarterly MAC meetings and will continue to provide general support to Lake County MS4s as they continue to develop and implement their stormwater management programs. SMC will prepare an annual report on its stormwater management activities and will provide guidance to Lake County MS4s in preparing their own annual reports.

*Measurable Goal(s): Track number of MAC meetings conducted.
Prepare annual report on Qualifying Local Program stormwater management activities.
Prepare template for use by Lake County MS4s in creating their own annual reports.*

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

C. Illicit Discharge Detection and Elimination

SMC will continue to support Lake County MS4s in the development and implementation of their stormwater management programs by performing activities related to the Illicit Discharge Detection and Elimination MCM, as described below. Note, however, that the primary responsibility for the implementation of the Illicit Discharge Detection and Elimination MCM lies with the MS4.

C.2 Regulatory Control Program

SMC provides local MS4s with model and example illicit discharge ordinances that prohibit all non-stormwater discharges, including illegal dumping, to the storm sewer system. Additionally, the WDO includes provisions that prohibit illicit discharges to the storm sewer system during construction (i.e., prior to final site stabilization) on development sites.

Measurable Goal(s): Provide model and example illicit discharge ordinances to Lake County MS4s. Continue to administer and enforce the WDO.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

C.10 Other Illicit Discharge Controls

SMC regularly sponsors and co-sponsors educational and technical training workshops on a variety of stormwater management-related topics. Each year, SMC will sponsor or co-sponsor an illicit discharge detection and elimination workshop or other training workshop related to IEPA's NPDES Stormwater Program and track the number of attendees that attend the workshop.

Additionally, as part of its public education and outreach efforts, SMC distributes informational materials throughout Lake County about the hazards associated with illegal discharges and the improper disposal of waste.

Measurable Goal(s): Sponsor or co-sponsor and track the number of attendees at an Illicit Discharge Detection and Elimination workshop or other training workshop related to IEPA's NPDES Stormwater Program. Distribute informational materials about the hazards of illicit discharges and illegal dumping from "take away" rack at SMC and SMC website.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

D. Construction Site Runoff Control

Lake County has adopted a countywide Watershed Development Ordinance (WDO) that establishes the minimum stormwater management requirements for development in Lake County, including requirements for construction site runoff control. SMC will continue to support Lake County MS4s in the implementation of the Construction Site Runoff Control MCM by administering and enforcing the WDO and performing other stormwater management activities, as described below. Note, however, that the primary responsibility for the implementation of the Construction Site Runoff

Control MCM in certified communities (i.e., communities certified by SMC to administer and enforce the provisions of the WDO) lies with the MS4.

D.1 Regulatory Control Program

The WDO is the regulatory mechanism that requires the use of soil erosion and sediment controls on development sites throughout Lake County. The soil erosion and sediment control provisions of the WDO are included in Article IV, Section B.1.j. of the ordinance. At a minimum, these standards apply to any development project that hydrologically disturbs 5,000 square feet of land or more.

SMC has also created a Designated Erosion Control Inspector (DECI) program. The purpose of the program is to facilitate positive communication between the permit issuing agency, whether such agency be SMC or a certified community, and the permit holder, by creating a single point of contact for the discussion and resolution of site soil erosion and sediment control issues and concerns. Furthermore, the program is intended to improve site conditions, minimize environmental impacts, and educate contractors, developers, and inspectors about the use of soil erosion and sediment control BMPs. It is worth noting that the DECI program was designed to closely mirror the inspection requirements of IEPA's General NPDES Permit No. ILR10.

*Measurable Goal(s): Continue to administer and enforce the WDO.
Continue to administer the Designated Erosion Control Inspector (DECI) program outlined by the WDO.*

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

D.2 Erosion and Sediment Control BMPs

Article IV, Section B.1.j of the WDO specifies the soil erosion and sediment control measures that must be used in conjunction with any land disturbing activities conducted on a development site. It specifies the use of a variety of soil erosion and sediment control BMPs including: minimize soil disturbance; protect adjoining properties from erosion and sedimentation; complete installation of soil erosion and sediment control features prior to commencement of hydrologic disturbance; stabilize disturbed areas within 7 days of active disturbance; avoid disturbance of streams whenever possible; use controls that are appropriate for the size of the tributary drainage area; protect functioning storm sewers from sediment; prevent sediment from being tracked onto adjoining streets; limit earthen embankments to slopes of 3H:1V; identify soil stockpile areas; and utilize statewide standards and specifications as guidance for soil erosion and sediment control.

SMC has also prepared a Technical Reference Manual (TRM) to accompany the WDO. The TRM is used to guide the creation of development plans that are in compliance with the provisions of the WDO and provides detailed information on the use of soil erosion and sediment control BMPs. It is currently being updated by the Technical Advisory Committee (TAC).

*Measurable Goal(s): Continue to administer and enforce the WDO.
Continue to work on updates to the Technical Reference Manual (TRM) and toward publication of the updated document.*

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

D.3 Other Waste Control Program

Article IV, Section B.1.j of the WDO includes provisions related to the control of waste and debris during construction on development sites.

Measurable Goal(s): Continue to administer and enforce the provisions of the WDO related to the control of waste and debris during construction on development sites.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

D.4 Site Plan Review Procedures

A community's designated enforcement officer is responsible for reviewing and permitting development plans and for administering and enforcing the provisions of the WDO. Within certified communities (i.e., communities certified by SMC to administer and enforce the provisions of the WDO), responsibility for reviewing and permitting development plans and for administering and enforcing the provisions of the WDO lies with the MS4; within non-certified communities, the designated enforcement officer is SMC's chief engineer. All designated enforcement officers must pass an exam in order to qualify to act as such. SMC administers this enforcement officer program, providing training on an as-needed basis to all enforcement officers to assist them in passing the exam, and maintains an up-to-date list identifying each community's designated enforcement officer. In addition to administering the enforcement officer program, SMC periodically reviews each community's WDO administration and enforcement records, using the results of such review to evaluate the performance of certified communities and designated enforcement officers.

SMC has also prepared a Technical Reference Manual (TRM) to accompany the WDO. The TRM is used to guide the creation of development plans that are in compliance with the provisions of the WDO and provides additional guidance on the administration and enforcement of the ordinance. It is currently being updated by the Technical Advisory Committee (TAC).

Measurable Goal(s): Administer the Enforcement Officer (EO) program outlined by the WDO. Maintain an up-to-date list identifying each community's designated enforcement officer. Periodically review each community's WDO administration and enforcement records. Continue to work on updates to the Technical Reference Manual (TRM) and toward publication of the updated document.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

D.5 Public Information Handling Procedures

SMC provides a number of opportunities for the receipt and consideration of information submitted by the public. SMC's Citizen Inquiry Response System (CIRS) documents and tracks the resolution of problems and complaints reported by the public. SMC's website provides information on "who to call" for various stormwater-related problems and concerns. An Interagency Coordination Agreement between SMC, the US Army Corps of Engineers, and the National Resources Conservation Service specifies that if any of these agencies receive a report of a soil erosion and

sediment control issue, they will relay such report to SMC. SMC will then investigate the report and prescribe appropriate corrective actions, sharing the results of such investigation with the property owner and any applicable local, state, or federal agencies. Within certified communities, such investigations are coordinated with the community's designated enforcement officer.

Measurable Goal(s): Document and track the number of soil erosion and sediment control-related complaints received and processed by SMC.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

D.6 Site Inspection/Enforcement Procedures

Article VI of the WDO contains both recommended and minimum requirements for the inspection of development sites. Within certified communities, the community's designated enforcement officer is responsible for conducting these inspections; within non-certified communities, SMC's chief engineer is responsible for conducting these inspections. Per the ordinance, these inspections may be conducted by a community's designated enforcement officer at any stage in the construction process. For major developments, as defined by the WDO, the enforcement officer conducts site inspections, at a minimum, upon completion of installation of soil erosion and sediment controls, prior to the start of any other land disturbing activities, and after final stabilization and landscaping, prior to the removal of soil erosion and sediment controls.

Article VII of the WDO specifies the legal actions that may be taken and the penalties that may be imposed if the provisions of the WDO are violated. If development activities on a development site are not in compliance with the requirements of the WDO, the enforcement officer may issue a stop work order on all development activity on the development site or on the development activities that are in direct violation of the WDO. In addition, failure to comply with any of the requirements of the WDO constitutes a violation of the WDO, and any person convicted of violating the WDO may be fined.

Measurable Goal(s): Document and track the number of site inspections conducted by SMC.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

E. Post-Construction Runoff Control

As described above, Lake County has adopted a countywide Watershed Development Ordinance (WDO) that establishes the minimum stormwater management requirements for development in Lake County, including requirements for post-construction runoff control. SMC will continue to support Lake County MS4s in the implementation of the Post-Construction Runoff Control MCM by administering and enforcing the WDO and performing other stormwater management activities, as described below. Note, however, that the primary responsibility for the implementation of the Post-Construction Runoff Control MCM in certified communities (i.e., communities certified by SMC to administer and enforce the provisions of the WDO) lies with the MS4.

E.2 Regulatory Control Program

The WDO requires all applicants to adopt stormwater management strategies for controlling post-construction stormwater runoff on development sites. As outlined in Article IV, Section B.1 of the

WDO, all applicants must adopt stormwater management strategies that minimize increases in stormwater runoff rates, volumes, and pollutant loads from development sites. Proposed stormwater management strategies must address the runoff volume reduction requirements described in Article IV, Section B.1.d of the WDO and must include appropriate stormwater BMPs to address the other applicable post-construction runoff control requirements of the WDO.

Measurable Goal(s): Continue to administer and enforce the WDO.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

E.3 Long Term O&M Procedures

The WDO requires that maintenance plans be developed for all stormwater management systems designed to serve major developments, as defined by the WDO. Such maintenance plans must include: a description of all maintenance tasks; an identification of the party or parties responsible for performing such maintenance tasks; a description of all permanent maintenance easements or access agreements, overland flow paths, and compensatory storage areas; and a description of dedicated sources of funding for the required maintenance. The WDO also requires that all stormwater management systems be located within a deed or plat restriction (e.g., easement) to ensure that the system remains in place in perpetuity and that access to the system is maintained in perpetuity for inspection and maintenance purposes.

Measurable Goal(s): Continue to administer and enforce the WDO.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

E.4 Pre-Construction Review of BMP Designs

As described above, a community's designated enforcement officer is responsible for reviewing and permitting development plans and for administering and enforcing the provisions of the WDO. This includes a review of the stormwater BMPs that will be used to meet the post-construction runoff control requirements of the WDO.

Measurable Goal(s): Continue to administer and enforce the WDO.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

E.5 Site Inspections During Construction

As described above, Article VI of the WDO contains both recommended and minimum requirements for the inspection of development sites. Per the ordinance, these inspections may be conducted by a community's designated enforcement officer at any stage in the construction process. For major developments, as defined by the WDO, the enforcement officer conducts site inspections, at a minimum, upon completion of installation of soil erosion and sediment controls, prior to the start of any other land disturbing activities, and after final stabilization and landscaping, prior to the removal of soil erosion and sediment controls.

Measurable Goal(s): Continue to administer and enforce the WDO.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

E.6 Post-Construction Inspections

As described above, Article VI of the WDO contains both recommended and minimum requirements for the inspection of development sites. Per the ordinance, these inspections may be conducted by a community's designated enforcement officer at any stage in the construction process, including after final stabilization and landscaping, after the removal of soil erosion and sediment controls. For major developments, as defined by the WDO, the enforcement officer conducts site inspections, at a minimum, upon completion of installation of soil erosion and sediment controls, prior to the start of any other land disturbing activities, and after final stabilization and landscaping, prior to the removal of soil erosion and sediment controls.

Measurable Goal(s): Continue to administer and enforce the WDO.

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

E.7 Other Post-Construction Runoff Controls

Through the Watershed Management Board (WMB), SMC provides partial funding for flood damage reduction and surface water quality improvement projects. The WMB, which includes representatives from the Lake Michigan, North Branch of the Chicago River, Fox River, and Des Plaines River watersheds, meets annually to review potential projects and to make recommendations on stormwater BMP project funding. Members of the WMB include chief municipal elected officials, township supervisors, drainage district chairmen, and county board members from each district found within each of Lake County's four major watersheds. The goal of the WMB program is to maximize opportunities for local units of government and other groups to have input and influence on the solutions used to address local stormwater management problems. Previous WMB-funded projects have reduced flooding, improved surface water quality, and enhanced existing stormwater management facilities throughout Lake County.

*Measurable Goal(s): Conduct annual WMB meeting.
Contribute funding to flood damage reduction and water quality improvement projects through the WMB.*

Milestone(s): SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.

F. Pollution Prevention/Good Housekeeping

SMC will continue to support Lake County MS4s in the development and implementation of their stormwater management programs by performing activities related to the Pollution Prevention/Good Housekeeping MCM, as described below. Note, however, that the primary responsibility for the implementation of the Pollution Prevention/Good Housekeeping MCM lies with the MS4.

F.1 Employee Training Program

SMC will assist Lake County MS4s with the development and implementation of their employee training programs by maintaining a list of known employee training resources and opportunities, making available a software-based employee training program, and providing, upon request, technical assistance to local MS4s in developing and implementing their employee training programs. In addition, each year, SMC will sponsor or co-sponsor a training workshop related to pollution prevention/good housekeeping or another workshop related to IEPA's NPDES Stormwater Program.

Measurable Goal(s): *Maintain a list of known employee training resources and opportunities. Make available the Excal Visual Storm Watch: Municipal Storm Water Pollution Prevention software-based employee training program. Sponsor or co-sponsor a training workshop related to pollution prevention/good housekeeping or another training workshop related to IEPA's NPDES Stormwater Program.*

Milestone(s): *SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.*

F.5 Flood Management/Assess Guidelines

In working toward meeting its primary goals of flood damage reduction and surface water quality improvement, SMC follows a set of stormwater management policies that were created to define its roles and responsibilities for stormwater management in Lake County. One of these policies is to integrate multi-objective opportunities (e.g., flood damage reduction, surface water quality improvement, environmental enhancement) into SMC-sponsored projects. In accordance with this policy, SMC will evaluate all SMC-sponsored projects for multi-objective opportunities.

Measurable Goal(s): *Track number of SMC-sponsored projects that are reviewed for multi-objective opportunities.*

Milestone(s): *SMC began implementation of this BMP in March 2003 and will continue to implement it on an annual basis.*