Stormwater Management Program

NPDES Permit #IDS028207

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Contents

ACRONYMS

AHDS Associated Highway District Standards
BMP Best Management Practice
CFR Code of Federal Regulations
CGP Construction General Permit CWA Clean Water Act
EPA Environmental Protection Agency
ERP Enforcement Response Policy
ESHD East Side Highway District
GIS Geographic Information System
IDDE Illicit Discharge Detection & Elimination
IDEQ Idaho Department of Environmental Quality
LHD Lakes Highway District
µg/L Micrograms per Liter
mg/L Milligrams per Liter
MEP Maximum Extent Practicable
MS4 Municipal Separate Storm Sewer System
NPDES National Pollutant Discharge Elimination System
O&M Operations & Maintenance
ORI Outfall Reconnaissance Inventory
PCB Polychlorinated Biphenyls
PFHD Post Falls Highway District
SEEP Stormwater & Erosion Education Program
SWMP Storm Water Management Program
TMDL Total Maximum Daily Load
US United States
USACE United States Army Corps of Engineers
WLA Wasteload Allocations
WOTUS Waters of the United States
WQS Water Quality Standards

DEFINITIONS

Best Management Practice (BMP): Schedules of activities, prohibition of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of waters of the United States. BMPs also mean treatment requirements operating procedures, and practices to control, runoff, spillage, or leads, sludge, or waste disposal, or drainage from raw material storages. See 40 CFR 122.2 and 122.44(k). For the purposes of the NPDES Permit, BMP broadly refers to any type of structural or non-structural practice or activity undertaken by the Permittee in the course of implementing its SWMP.

Code of Federal Regulations (CFR): The official annual compilation of all regulations and rules promulgated during the previous year by the agencies of the United States government, combined with all the previously issued regulations and rules of those agencies that are still in effect.

Construction General Permit (CGP): The current available version of EPA's MPDES 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/gcp.

Construction Activity: Includes, but is not limited to, clearing, grading, excavation, and other site preparation work related to the construction of residential buildings and non-residential buildings, and heavy construction (e.g., highways, streets, bridges, tunnels, pipelines, transmission lines, and industrial non-building structures).

Coeur d'Alene Urbanized Area (NPDES Permit Area): Defined by the decennial census data from Year 2020. An urbanized area is the densely settled core of census tracts and/or census blocks that have a population of at least 50,000, along with adjacent territory containing non-residential urban land uses as well as territory with low population density included to link outlying densely settled territory with the densely settled core. It is a calculation used by the Bureau of Census to determine the geographic boundaries of the most heavily developed and dense urban areas. Once a small MS4 is designated into the program based on the UA boundaries, it cannot be waived from the program if in subsequent UA calculation the small MS4 is no longer with the UA boundaries.

Clean Water Act (CWA): (formerly referred to as the Federal Water Pollution Control Act or Federal Water Pollution Control Act Amendments of 1972) Public Law 92-500, as amended by Public Law 95-217, Public Law 95-576, Public Law 96-483, and Public Law 97-117, 33 U.S.C. § 1251 et seq. [40 CFR §122.2].

Discharge of a Pollutant: any addition of any "pollutant" or combination of pollutants to "waters of the United States" from any "point source," or any addition of any pollutant or combination of pollutants to the waters of the "contiguous zone" or the ocean from any point source other than a vessel or other floating craft which is being used as a means of transportation. This definition includes additions of pollutants into waters of the United States from: surface runoff which is collected or channeled by man; discharges through pipes, sewers, or other conveyances owned by a State, municipality, or other person which do not lead to a treatment works; and discharges through pipes, sewers, or other conveyances, leading into privately owned treatment works. This term does not include an addition of pollutants by any "indirect discharger" [40 CFR §122.2].

Erosion: The process of carrying away soil particles by the action of water.

Hazardous Materials: Defined at IDAPA 58.01.02.010.47 and means a material or combination of materials which, when discharged in any quantity into state waters, presents a substantial present or potential hazard to human health, the public health, or the environment. Unless otherwise specified, published guides such as Quality Criteria for Water (1976) by EPA, Water Quality Criteria (Second Edition, 1963) by the state of California Water Quality Control Board, their subsequent revisions, and more recent research papers, regulations and guidelines will be used in identifying individual and specific materials and in evaluating the tolerances of the identified materials for the beneficial uses indicated.

Impaired Waters: Any water body that does not meet applicable water quality standards for one or more beneficial uses by one or more pollutants. For the purposes of this Permit, impaired water includes any water body that IDEQ includes in its 2014 Integrated Report, as a "Category 4a" water of the state for which a total maximum daily load has been completed and approved; as a "Category 4b" water of the state that have pollution control requirements in place other than a TMDL and are expected to meet standards; and/or as a "Category 5" water of the state where a TMDL is necessary. The term impaired water also includes any interstate surface water body that originates in Idaho and flows into Washington that the Washington Department of Ecology categorizes as Category 4a, 4b, or 5 in its latest Water Quality Assessment 305(b) Report and 303(d) List as approved by EPA on July 22, 2016.

Illicit Connections: Include, but are not limited to, pipes, drains, open channels, or other conveyances that have the potential to allow an illicit discharge to enter the MS4.

Illicit Discharge: Any discharge to a municipal storm sewer that is not composed entirely of stormwater except discharges pursuant to a NPDES permit (other than the NPDES permit for discharges from the municipal separate storm sewer) and discharges from firefighting activities. See 40 CFR 122.26(b)(2).

Interconnection: The point (excluding sheet flow over impervious surfaces) where the Permittee's MS4 discharges to another MS4 or other storm sewer system, through which the discharge is eventually conveyed to a water of the United States. Interconnections shall be treated similarly to outfalls throughout the Permit.

MS4 (Municipal Separate Storm Sewer System): Is used in the NPDES Permit 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 the NPDES Permit, refers to those portions of the municipal separate storm sewer systems owned and/or operated by the entities named herein. See also Municipal Separate Storm Sewer and Small MS4.

Municipality: A city, town, borough, county, parish, district, association, or other public body created by or under State law and having jurisdiction over disposal of sewage, industrial wastes, or other wastes, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under Section 208 of the CWA.

Municipal Separate Storm Sewer: 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): 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].

Outfall: Defined at 40 CFR §122.26(b)(9) means a point source (see definition below) at the point where a municipal separate storm sewer discharges to waters of the United States and does not include open conveyances connecting two municipal separate storm sewers or pipes, tunnels, or other conveyances which connect segments of the same stream or other waters of the United States and are used to convey waters of the United States.

Permanent Stormwater Controls, or Practices, Permanent Controls, and/or Post-Construction Stormwater Management Controls: Structural and non-structural controls that are designed to treat or control pollutants in stormwater runoff on a permanent basis.

Permit: For the purposes of this document, means North Idaho Highway Districts MS4 NPDES Permit.

Pollutant: Dredged spoil, solid waste, incinerator residue, filter backwash, sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, radioactive materials [except those regulated under the Atomic Energy Act of 1954, as amended (42 U.S.C. § 2011 et seq.)], heat, wrecked or discarded equipment, rock, sand, cellar dirt and industrial, municipal, and agricultural waste discharged into water [40 CFR §122.2].

Pollutant(s) of Concern: For the purposes of the NPDES Permit, any pollutant identified by IDEQ or WDOE as a cause of impairment of any water body that receives MS4 discharges authorized under the NPDES Permit. See also “impaired water.”

Post-Construction Stormwater Management Controls or “Permanent Stormwater Controls”: Controls designed to treat or control runoff on a permanent basis once construction is complete.

Redevelopment: For the purposes of the NPDES Permit, the alteration , renewal or restoration of any developed land or property that results in land disturbance of one acre or more, or less than one acre that is part of a common plan of development of sale that exceeds one acre, and that has one of the following characteristics: land that currently has an existing structure, such as buildings or houses; or land that is currently covered with an impervious surface, such as a parking lot or roof; or land that is currently degraded and is covered with sand, gravel, stones, or other non-vegetative covering.

Storm Event: For the purposes of the NPDES Permit, means a precipitation event that results in an actual discharge from the outfall, and which follows the preceding measurable storm event by at least 48 hours (2 days).

Stormwater and Storm Water Runoff: As used in the NPDES Permit, means stormwater runoff, snow melt runoff, and surface runoff and drainage, and is defined at 40 CFR §122.26(b)(13). “Stormwater”

means that portion of precipitation that does not naturally percolate into the ground or evaporate, but flows via overland flow, interflow, channels, or pipes into a defined surface water channel or a constructed infiltration facility.

Stormwater Control Measure or Stormwater Management Program Control Measure: The physical, structural, and/or managerial measures that, when used singly or in combination, reduce the downstream quality and quantity impacts of storm water runoff. Also, stormwater control measures means a permit term or condition used to prevent or control the discharge of pollutants. This may include a schedule of activities, prohibition of practices, maintenance procedures, or other management practices. Stormwater control measures may include, but are not limited to, treatment requirements; operating procedures; practices to control plant site runoff, spillage, leaks, sludge, or waste disposal; or drainage from raw material storage. See best management practices (BMPs). Minimum stormwater control measures are defined 40 CFR §122.34(b).

Stormwater Management Practice or Stormwater Management Control: Practices that manage stormwater, including structural and vegetative components of a storm water system.

Stormwater Management Program (SWMP): A comprehensive program to manage the quality of storm water discharged from the municipal separate storm sewer system. For the purposes of the NPDES Permit, the SWMP consists of the actions and activities conducted by the Permittees as required by the NPDES Permit and described in the Permittees' SWMP Document. A "SWMP Document" is the written summary describing the unique and/or cooperative means by which an individual Permittee or entity implements the specific stormwater management control measures required by the NPDES Permit within their jurisdiction.

Small Municipal Separate Storm Sewer System or Small MS4: Defined at 40 CFR 122.26(b)(16) and (17), respectively, and means all separate storm sewers that are: (i) owned or operated by the United States, 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) not defined as "large" or "medium" municipal separate storm sewer systems pursuant to 40 CFR 122.26(b)(4) and (b)(7), or designated under paragraph 40 CFR 122.26(a)(1)(v); and (iii) includes systems similar to separate storm sewer systems in municipalities, such as systems at military bases, large hospital or prison complexes, and highways and other thoroughfares. The term does not include separate storm sewers in very discrete areas, such as individual buildings.

Total Maximum Daily Load (TMDL): the sum of the individual wasteload allocations for point sources, load allocations (LAs) for non-point sources, and natural background. Such load shall be established at a level necessary to implement the applicable water quality standards with seasonal variations and a margin of safety which takes into account any lack of knowledge concerning the relationship between effluent limitations and water quality [IDAPA 58.012.02.010.100].

Toxic Substance: Defined at IDAPA 58.01.02.010.102, and means any substance, material or disease-causing agent, or a combination thereof, which after discharge to waters of the State and upon exposure, ingestion, inhalation or assimilation into any organism (including humans), either directly from the environment or indirectly by ingestion through food chains, will cause death, disease,

behavioral abnormalities, malignancy, genetic mutation, physiological abnormalities (including malfunctions in reproduction) or physical deformations in affected organisms or their offspring. Toxic substances include, but are not limited to, the one hundred twenty-six (126) priority pollutants identified by the EPA pursuant to Section 307(a) of the federal Clean Water Act.

Treatment: The reduction and removal of pollutants from stormwater.

Uncontaminated: For the purposes of the NPDES Permit, means that the MS4 discharge does not:

- result in the discharge of a reportable quantity for which notification is or was required pursuant to 40 CFR 117.21 or 40 CFR 302.6 at any time since November 16, 1987; or
- result in the discharge of a reportable quantity for which notification is or was required pursuant to 40 CFR 110.6 at any time since November 16, 1987; or
- contribute to a violation or exceedance of an applicable Idaho Water Quality Standard.

Waters of the United States or Waters of the US:

- All waters which are currently used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;
- All interstate waters, including interstate "wetlands;"
- All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, "wetlands," sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds the use, degradation, or destruction of which would affect or could affect interstate or foreign commerce including any such waters:
    - Which are or could be used by interstate or foreign travelers for recreational or other purposes;
    - From which fish or shellfish are or could be taken and soldi n interstate or foreign commerce; or
    - Which are used or could be used for industrial purposes by industries in interstate commerce;
- All impoundments of water otherwise defined as waters of the United States under this definition;
- Tributaries of waters identified in paragraphs (a) through (d) of this definition;
- The territorial sea; and
- Wetlands adjacent to waters (other than waters that are themselves wetlands) identified in paragraphs (a) through (f) of this definition [40 CFR §122.2].

1. BASIC SWMP INFORMATION

This Storm Water Management Program (SWMP) Document was developed originally by Ruen-Yeager & Associates, Inc. on behalf of the Lakes, Post Falls, and East Side Highway Districts (North Idaho Highway Districts) and updated by Welch Comer Engineers to describe the activities and control measures conducted to meet the terms and conditions of NPDES Permit # IDS028207.

1.1 Staff Organization

This document contains information pertaining to a Storm Water Management Program for the Lakes Highway District. The personnel responsible for implementing the SWMP are the respective Highway District Director of Highways. Lakes Highway District Director of Highways is Eric Shanley, PE.
The Associated Highway Districts of Kootenai County consist of the East Side, Lakes, Post Falls, and Worley Highway Districts. The East Side, Lakes, and Post Falls Highway Districts are joint permittees under NPDES Permit #IDS028207. However, each Highway District is independently responsible for MS4 permit compliance, operates independent of the other, and has established mapped boundaries, with individual elected Board of Commissioners.

This SWMP was developed under agreement between the participating Associated Highway Districts of Kootenai County to be adopted as a management program tool to provide guidance and track progress of respective Highway District MS4s under the joint NPDES permit.

1.2 Receiving Waters

The waterbodies identified in Table 1 receive storm water discharges from the Lakes Highway District MS4.

Table 1 Receiving Water Summary

Receiving Waterbody Segments	WQS Classification	Impairment or Pollutant of Concern	TMDLs? (Yes/No)	Applicable WLAs (Yes/No)	No. of Discharging Outfalls
Hayden Lake	Category 4A (Not supporting)	Total Phosphorus	Yes	No	**24**
Avondale Lake	Not assessed	N/A	N/A	N/A	**5**

1.3 SWMP Information and Statistics

Lakes Highway District will track the following information to set priorities and assess permit compliance:

Public Education and Outreach – Events performed in respect to Public Education and Outreach will be documented. Any questionnaires administered during outreach will be recorded and analyzed for effectiveness.

Illicit Discharge Detection and Elimination – Lakes Highway District is always monitoring for illicit discharges in its district as they make daily travel through the District.

- MS4 Maps and Outfall Inventory have been developed and refined for Lakes Highway District to more accurately depict point source discharges to Lakes Highway District MS4 jurisdiction.

- Dry Weather Outfall Screening – All outfalls were observed during July through September dry season and any outfalls with flows were tested for pH; total chlorine; surfactants; total phenols; E. coli; total phosphorus; turbidity; temperature and suspended solids. Test results are documented and will provide a baseline for future identification or investigation of recurring illicit discharges.

- Annual training is documented and performed for the staff of each Highway District to identify and respond to illicit discharges and for good housekeeping and best management practices.

Construction Site Stormwater Runoff Control – Lakes Highway District requires erosion control, sediment control, and waste material management controls for any projects within their MS4 jurisdiction. Any projects disturbing one or more acres are required to obtain NPDES coverage under the current Idaho Construction General Permit.

- Lakes Highway District will log the nature and number of inspections, follow up actions, and subsequent enforcement actions.

Post-Construction Stormwater Management for New Development and Redevelopment – Lakes Highway District will require the installation and long-term maintenance of permanent stormwater controls at new development and redevelopment project sites within their MS4 boundary that result in land disturbance of greater than or equal to one (1) acre.

- The Highway Districts will perform plan reviews and approval of permanent stormwater controls.

Pollution Prevention/Good Housekeeping for MS4 Operations – Lakes Highway District does not have any facilities, yards, or material stockpile areas within the MS4 boundary. However, they do still adhere to and require best management practices within their facilities.

- Lakes Highway District will maintain records reflecting their catch basin and inlet inspection and cleaning.

- Lakes Highway District will maintain a schedule for street sweeping in the MS4 area streets every spring as soon as weather permits.

- Lakes Highway District began a spring reminder in 2021 to all registered trash pick-up groups to schedule their trash pick-ups in the months of May.

- Lakes Highway District conducts and documents annual staff training sessions concerning pollution prevention, proper BMP's, good housekeeping practices, and illegal discharge and detection information.

- Lakes Highway District also performs public outreach, including workshops, fliers, and media, etc. These outreach methods are detailed throughout this SWMP.

- Lakes Highway District maintains a website containing information on their MS4.

Street Sweeping – Lakes Highway District completed street sweeping each spring and logs when the sweeping occurs. A map of the street sweeping schedule for 2023 is in the appendix.

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

There are no Transfers of Ownership, Operational Authorities, or responsibilities for SWMP implementation. Each permitted Highway District is responsible for its own MS4 jurisdiction.

2. MAP OF THE SEPARATE STORM SEWER SYSTEM

The Lakes MS4 Outfall Map is in the appendix. The LHD maintains twenty-nine (29) MS4 Outfalls within the Coeur d'Alene Urbanized Area. The primary receiving water is to the northwest and southeast shoreline of Hayden Lake and Avondale Lake, with many pipe outlets (Outfalls) located on private property, at or near the waterline. Where possible, outfalls on private property were examined from within the public right of way, particularly if no runoff was present. In a few locations with runoff, the private property owners were contacted to gain permission to take a water sample. The full dry weather inspection memo, inspection reports, and additional photos are in the appendix.

2024 Dry Weather Monitoring Photos

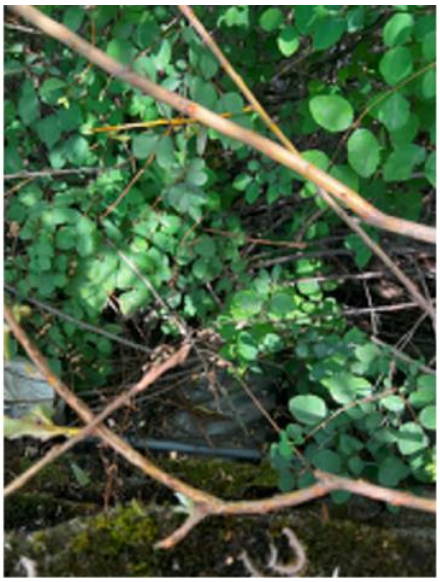
Outfall 1

Outfall 2

Outfall 3

Outfall 4

Outfall 5



Outfall 6/7

Outfall 8

Outfall 9

Outfall 10

Outfall 11

Outfall 12

Outfall 13

Outfall 14

Outfall 15

Outfall 16

Outfall 17

Outfall 18

Outfall 19

Outfall 20

Outfall 21

Outfall 22

Outfall 23

Outfall 24

Outfall 25

Outfall 26

Outfall 27

Outfall 28

Outfall 29

3. **TARGETING POLLUTANTS OF CONCERN**

There are no specific requirements for Lakes Highway District in Part 4 of the NPDES Permit.

4. LEGAL AUTHORITY AND ENFORCEMENT

Lakes Highway District has no ordinance authority under Idaho Code and must rely on the authority of Kootenai County, Idaho Department of Environmental Quality, and Panhandle Health for enforcement.

Lakes Highway District relies on the following legal authorities.	
To prohibit and eliminate illicit discharges to the MS4.	**Kootenai County, Idaho Department of Environmental Quality, Panhandle Health**
To control the discharge of spills, dumping or disposal of materials other than stormwater to the MS4.	**Kootenai County, Idaho Department of Environmental Quality, Panhandle Health**
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.	**Kootenai County**
To control the contribution of pollutants from one MS4 to another interconnected MS4.	**Idaho Department of Environmental Quality**
To require local compliance with such requirements.	**Kootenai County, Idaho Department of Environmental Quality, Panhandle Health**
To carry out all inspection, surveillance, and monitoring procedures necessary to determine compliance and noncompliance with the Permit.	**Idaho Department of Environmental Quality**

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

The following sections describe Lakes Highway District'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 Lakes Highway District 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 Lakes Highway District must:

- ✓ Require appropriate erosion, sediment, and waste management requirements for construction site activity that results in land disturbance of 1 acre or more.
- ✓ Establish installation and use guidelines for required erosion/sediment/waste management during all phases of construction site activity.
- ✓ 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.
- ✓ Inspect and enforce erosion, sediment, and waste management requirements on construction sites.
- ✓ Establish an inspection prioritization plan.
- ✓ Establish an enforcement response policy.
- ✓ Ensure that Permittee staff is trained to conduct these activities.

Staff Training

Date	Entities	Training Topics
2010 & 2011	LHD	Municipal Storm Water Pollution Prevention Training (Storm Watch)
2013	LHD & PFHD	Presentation by LHD's consulting engineer regarding MS4 areas and IDDE; video titled "Rain Check: Storm Water Pollution Prevention for MS4's"; Q&A session
December 22, 2014	LHD & PFHD	Annual Staff Training
December 11, 2015	LHD, PFHD, & ESHD	Annual Staff Training
November 29, 2016	LHD, PFHD, & ESHD	Annual Staff Training: BMPs, IDDE, "Rain Check" Videos
December 14, 2017	LHD, PFHD, & ESHD	Annual Staff Training: BMPs, Good Housekeeping, IDDE
December 7, 2018	LHD, PFHD, & ESHD	Annual Staff Training: BMPs, Good Housekeeping, IDDE
December 18, 2019	LHD, PFHD, & ESHD	Annual Staff Training: BMPs, Good Housekeeping, IDDE
September 23, 2021	LHD	Annual Staff Training: BMPs, Good Housekeeping, IDDE
September 21, 2022	LHD	Annual Staff Training: BMPs, Good Housekeeping, IDDE
Fall 2023	LHD	Annual Staff Training: BMPs, Good Housekeeping, IDDE
Fall 2024	LHD	Annual Staff Training: BMPs, Good Housekeeping, IDDE

The training materials and sign-in sheet are provided in the appendix.

Requirements for Construction Site Operators Disturbing >1 Acre

- In 2009, Lakes Highway District through Resolution 2009-12 and again by Resolution 2010-4 has required all construction projects within the District, whether performed by the District or under the supervision of, to be performed in accordance with the EPA Construction General Permit requirements.
- Resolution 2010-4 requires construction site operators within road rights-of-way under the jurisdiction of Lakes Highway District to obtain a permit from the District. These permits are evaluated to ensure appropriate BMPs are in-place for site stabilization and to ultimately prevent storm water runoff.
- Work outside of the road right-of-way, under the jurisdiction of Kootenai County, requires individuals performing work to comply with Kootenai County Site Disturbance Ordinance No. 374. 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.
- Additionally, the Lakes Highway District requires that construction conform to the Associated Highway District Standards and the Kootenai County Site Disturbance Ordinance. Lakes Highway District tracks issued permits and location with respect to the MS4. The LHD is committed to provide sufficient resources to oversee and direct contractors on work within the MS4. 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 though office and to Construction Operators who are permitted to do work within LHD right-of-way.

Enforcement of Local Erosion, Sediment, and Waste Management Control Requirements for Sites Disturbing >1 Acre

- In 2008, 2015, 2018, and again in 2019, the Lakes Highway District adopted the Highway Standards for the Associated Highway Districts of Kootenai County, Idaho. These standards provide procedures for design, construction operations and final construction acceptance (inspection) by the District. As part of the Districts 2010-04 Resolution and Illicit Discharge Detection and Elimination Program, the District will inspect construction sites that are permitted within the MS4 to ensure erosion control is in place during construction and that the construction site is clean. Violations will be documented and reported to the Kootenai County Code Enforcement Officer and/or EPA.
- For construction performed in the development of private property, work must comply with the Kootenai County Site Disturbance Ordinance, which addresses compliance and enforcement of storm water and erosion control. Additionally, when called upon by the Kootenai County to review Site Disturbance Plans and other improvement plans within its MS4, the District will provide a review of the temporary erosion control measures in addition to its review for compliance with the Associated Highway District Standards (AHDS). The District is jointly considering adding language to the AHDS to address MS4 NPDES Permit Conditions in the forthcoming standards revisions.
- Enforcement shall be in accordance with the identified authority in Section 4.

- In 2010, LHD began tracking public comments or inquiries concerning storm water related issues that are either received by phone or email. When an inquiry is received, Lakes staff log the date, address, contact information and description/reason for the call. A follow up comment is then posted concerning what response was given or results of an inspection performed regarding the call.

The Public Input Tracking Log is included in the appendix.

Prioritization of Inspection of Construction Sites:

- Highest Priority – Projects with one acre or more of disturbance and with potential to discharge to Lakes Highway District MS4 jurisdiction.

- Medium Priority – Projects with less than one area of disturbance and potential to discharge to Lakes Highway District MS4 jurisdiction.

- Lower Priority – Projects that have no potential to discharge to Lakes Highway District MS4 jurisdiction.

Lakes Highway District will log the nature and number of inspections, follow up actions, and subsequent enforcement actions. The Construction Site Inspection log is included in the appendix.

Enforcement Response Policy
The North Idaho Highway Districts will continue to refer enforcement policy instances to the authorities listed in Section 4.

Planned Activities for 2025
Lakes Highway District will do the following during the 2025 calendar year:

- Continue to develop, discuss with the Associated Highway District supervisors and commissioners, and adopt when finalized the NPDES related standards approved for inclusion in the next Associated Highway Districts of Kootenai County Highway Standards.
- Comply with CGP requirements for Lakes Highway District constructed projects.
- Review erosion control plans as part of its review process for private projects under Lakes Highway District jurisdiction.
- As part of the road inspection process for new private projects, ensure that the appropriate level of erosion control is in place during construction.
- Educate staff on construction storm water discharges and direct staff to keep an eye on construction storm water discharges from private projects during road maintenance activities and maintenance rounds.
- Document and report to IDEQ and Kootenai County any detected illegal construction storm water discharges.
- The District will track approach and utility permits within the MS4 and at the time of permit issuance will distribute Seep Field Guides regarding storm water BMPs to those projects located in the MS4.

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, Lakes, Post Falls, and East Side Highway Districts must:

- ✓ Require the installation and long-term maintenance of permanent storm water controls at new development and redevelopment project sites that result from land disturbance of 1 acre or more.
- ✓ Permanent storm water controls must be sufficient to retain onsite the runoff volume produced from a 24-hour, 95th percentile storm event; or sufficient to provide the level of pollutant removal greater than the pollutant removal expected by using onsite retention of runoff volume produced from a 24 hour, 95th percentile storm event.
- ✓ Alternatively, storm water treatment requirements must be required that can attain an equal or greater level of water quality benefits as onsite retention of storm water discharges from new development and redevelopment sites.
- ✓ Other alternatives may be allowed for projects to meet the onsite retention requirement at a particular project site based on technical infeasibility, and/or site constraints.
- ✓ Establish proper installation and use guidelines for permanent storm water controls – the Permittee may establish different types of controls for different types and/or sizes of site development activity.
- ✓ At a minimum, review and approve preconstruction plans for permanent storm water controls at new development and redevelopment sites that result from land disturbance of one (1) or more acres
- ✓ 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,
- ✓ Maintain a database inventory to track and manage the operational condition of permanent storm water controls
- ✓ Ensure the appropriate Permittee staff is trained to conduct these activities.

Lakes Highway District

Implement and Enforce Installation Requirements of Permanent Sites

LHD does not have the authority over development needed to directly comply with this requirement. Kootenai County is the regulatory authority over developments and redevelopments. Development is required to comply with the Kootenai County Site Disturbance Ordinance No. 37 4. Only at such time that a development is complete and finally stabilized will the Highway District consider accepting roads within a development. 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. 37 4. When appropriate, LHD will encourage the County to require drywells to ensure all runoff is retained on-site.

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

If new roads are accepted by the Lakes Highway District for maintenance, Lakes Highway District ensures

proper long-term operation and maintenance of permanent storm water management controls within the road right-of-way under the jurisdiction of LHD.

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 have potential to discharge to its MS4s.
- Monitor private storm water facilities off the right-of-way that may discharge to the MS4. Notify the owner and/or Kootenai County and IDEQ if the facility is not being maintained or is not functioning properly.

Prioritization of Permanent Stormwater Controls

- Highest Priority – Projects with one acre or more of disturbance and with potential to discharge to Lakes Highway District MS4 jurisdiction.
- Medium Priority – Projects with less than one area of disturbance and potential to discharge to Lakes Highway District MS4 jurisdiction.
- Lower Priority – Projects that have no potential to discharge to Lakes Highway District MS4 jurisdiction.
- The Highway Districts will log the nature and number of inspections, follow up actions, and subsequent enforcement actions.

Enforcement Response Policy

As stated previously, LHD does not have ordinance authority. Therefore, the District will notify Kootenai County, IDEQ and Panhandle Health if it becomes aware of any potential violations.

Tracking of Operation & Maintenance of Permanent Controls

Lakes Highway District staff provide the Operations & Maintenance for permanent stormwater controls within their own jurisdiction. As the Outfall maps are revised to include all permanent stormwater controls, a tracking sheet will be developed to track the Operations & Maintenance activities. It is anticipated this task to be completed by 2024.

Planned Activities for 2025

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

- The District will work with the County and other agencies where it is able, in keeping with the intent of the above requirements.
- When called upon by the County to review Site Disturbance Plans and other improvement plans within the Districts MS4, the District will provide a review of the erosion control plans in addition to review for compliance with the Associated Highway District Standards.
- The District 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.

5.3 Pollution Prevention/Good Housekeeping for MS4 Operations

To properly operate and maintain the MS4, and its facilities using prudent pollution prevention and good housekeeping, Lakes Highway Districts must:

- ✓ Maintain a current Map of the MS4, including an inventory of all Outfalls and other features.
- ✓ Inspect catch basins and inlets at least once every five years. using an inspection prioritization plan.
- ✓ Maintain or clean catch basins based on those inspections.
- ✓ If applicable, maintain Operation and Maintenance (O&M) Procedures for Streets, Roads, Highways and Parking Lots.
- ✓ If applicable, inventory and manage Street/Road Maintenance Materials.
- ✓ If applicable, implement a Street, Road, Highway and Parking Lot Sweeping Management Plan.
- ✓ Maintain O&M Procedures for Other Municipal Areas and Activities to protect water quality.
- ✓ Use best practices to reduce the discharge of pollutants to the MS4 associated with the Permittee's application and storage of pesticides, herbicides and fertilizers.
- ✓ Develop site-specific Pollution Prevention Plans for Permittee-owned facilities.
- ✓ Work cooperatively with other entities to control litter on a regular basis.
- ✓ Ensure the appropriate Permittee staff is trained to conduct these activities.

Operations & Maintenance Requirements

In 2010, Lakes Highway District formalized an Operations & Maintenance plan for the operations facility on Ramsey Road (See the Lakes Highway District Operations & Maintenance Program in the appendix).

Inlet/Catch Basin Inspections & Maintenance

As Lakes Highway District improves and completes their outfall map to include catch basins, an inspection and maintenance schedule will be developed and implemented to meet the requirements of catch basin inspection and cleaning at least once per five years.

Last Review/Update of Inspection and Maintenance Schedules

Lakes Highway District will implement a yearly checklist (see attached) of Pollution Prevention and Good Housekeeping Practices and intends to incorporate this inspection into its 2023 activities.

Material Storage Locations

The Lakes Highway District Maintenance yards are located outside of the Coeur d'Alene Urbanized Area and MS4 Boundary. Therefore, action contained in Section 3.5.4 is not specifically required. No further action will be taken under this permit.

Sweeping Management Plan

Lakes Highway District spring and summer maintenance efforts include street sweeping in the MS4 boundary. LHD will include their Street Sweeping Management Plan in the SWMP no later than April 3, 2025. The map of 2024 street sweeping activities is included in the appendix.

Planned Activities for 2025

- Continued implementation of the Operations & Maintenance Program.

- Conduct another training session for LHD employees in 2025 on good housekeeping, BMPs, and illicit discharge detection.
- Perform a Pollution Prevention & Good Housekeeping Check
- Send additional staff members to SEEP certification classes.

5.4 Illicit Discharge Detection and Elimination

To prohibit and eliminate illicit discharges to the MS4, Lakes Highway District must:

- ✓ Enforce an ordinance that effectively prohibits illicit discharges into the MS4.
- ✓ Respond to Complaints or Reports of illicit Discharges from the Public.
- ✓ Keep Track of Complaints/Reports, and any Response Actions Taken.
- ✓ Conduct MS4 outfall screening inspections during dry weather.
- ✓ Follow-up to determine the source of a recurring illicit discharge identified as a result of complaints, or of the dry weather screening investigations within thirty (30) days.
- ✓ Take appropriate action to address the source of an ongoing illicit discharge.
- ✓ Prevent and Respond to Spills to the MS4, as appropriate.
- ✓ Coordinate with other entities for the proper disposal of used oil and toxic materials.
- ✓ Ensure the appropriate Permittee staff is trained to conduct these activities.

Illicit Discharge Policies

The Highway District's will monitor MS4 areas for illicit discharges in accordance with the Illicit Discharge and Spill Response Plan (see attached). Examples of illicit discharges that the District will be looking for include:

- Sanitary sewage or drainfield effluent running over the surface into a ditch,
- Paint or oil dumped into a ditch or storm drain,
- A shop floor drain discharging to a ditch,
- Turbid construction site runoff,
- Other harmful pollutants (use common sense).

The Highway Districts have also developed a Spill Response Procedure detailing the actions to be taken when an illicit discharge is detected by a District employee:

1. Be Safe: Identify the pollutant and determine if it is safe to remain in the area and if safety equipment is needed
2. Stop the Source: If the source is readily identifiable and can be stopped quickly and safely, do so.
3. Notify: Dial 911 if you deem it an emergency.
4. Report the spill to your supervisor.
5. Notify the following agencies:
    - Northern Lakes Fire District: (208) 772-3044
    - Kootenai County Sheriff's Office: (208) 446-1850 for chemical spills
    - Idaho Department of Environmental Quality: (208) 769-1422 for wastewater discharges
    - Kootenai County Building and Planning Department: (208) 446-1070 for minor sediment discharges and code violations.
6. Protect Stormwater: If it can be safely done, while help is on the way, confine the spill with sandbags, berms, diversion ditches, etc.

7. Assist with Clean Up: Remain on site and assist by providing materials, labor and equipment as directed by the authority agency. Examples include sand, gravel, the District's Spill Kit, etc. Communicate with the authority agency and make sure that they are aware of concerns for protecting downstream surface water.
8. Notify EPA within 24 hours at (206) 553-1846.
9. Report: Supervisor to write a summary report of the incident and file it with SWMP monitoring records. Submit a copy of the report to EPA and IDEQ within 30 days.

The Dry Weather Outfall Screening procedures are as follows:

Task	Description
Dry Weather Field Inspections	Outfall Reconnaissance Inventory (ORI) – MS4's shall be visited at a minimum of one time during the months of July through September.
Dry Weather Quality Testing	At a minimum, if the inspector observes actual flow from an MS4 outfall, during dry weather, he/she should specifically note any observed color, odor, clarity, floating solids, foam, sheen, suspended or settled solids or other indicators of pollution. 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.
Analysis of Water Quality Data	Compare background tests to dry weather sampling results, if water present during dry weather inspections.
Reporting	Prepare a technical memo identifying the following: • Work performed • Results from Water Quality Testing • Illicit Discharge Detected, Reported and Results

The dry weather screening memo with inspection reports, photos, and test results are included in the appendix.

Conditional Allowance of Non-Stormwater Discharges

The District does not have ordinance authority and it is not aware of any existing local conditions on non-storm water discharges. If the District observes what it deems to be repeated violations of state surface water quality standards (IDAPA 58.01.02.200), it will notify EPA and IDEQ for enforcement assistance.

Some examples of allowable non-storm water discharges that may not need to be addressed include:

- Water line flushing
- Irrigation water
- Discharges from potable water sources
- Foundation drains
- Air-conditioning condensate
- Individual residence car wash water
- Dechlorinated swimming pool discharges
- Street wash water
- Groundwater

Targeting of Outfall Screening During Dry Weather
The highest priority in most programs is to find any continuous and intermittent sewage discharges to the storm drain system. A range of monitoring techniques can be used to find sewage discharges. In general, monitoring techniques are used to find problem areas and then trace the problem back up the stream or pipe to identify the ultimate generating site or connection. Monitoring can sometimes pick up other types of illicit discharge that occur on a continuous or intermittent basis (e.g., wash water and liquid wastes). Monitoring techniques are classified into three major groups:

- Outfall Reconnaissance Inventory
- Indicator Monitoring at Storm Water Outfalls and In-stream
- Tracking Discharges to their Source

All outfalls within the LHD's MS4 boundaries will be inspected and photographed on an annual basis.

Response to Illicit Discharges, Typical Complaints, and Other Findings
Responsibilities for illicit discharge detection and typical illicit discharge inspection type are as follows:

Tasks	Jurisdictional Authority	Responsible Parties
Inspection of Potential Illicit Discharge within Public Road Right-of-Way	LHD	LHD
Inspection of Potential Illicit Discharge from a Private Property	County	County
Repair/Cleanup of Illicit Discharge within Public Right-of-Way	LHD / County HazMat / Sewer District	LHD / County HazMat
Enforcement	County	County

All actions relating to illicit discharge detection will be recorded in a database administered by Lakes Highway District. The database will be organized by MS4 outfall and will contain information such as: the outfalls inspected, any complaints received, and tests conducted. Illicit discharge detection activities will also be documented on the storm sewer system map.
If an illicit discharge is identified, the Highway District will notify EPA within 24 hours by phone at (206) 553-1846, and provide a written report within 5 days (see Permit Part 7.9).

Outfall Screening During Dry Weather
Lakes Highway District conducts annual dry weather screening of all outfalls within the District (see Dry Weather Monitoring Plan and Lakes Highway District Dry Weather Report 2024 in attachments).

The table shows the following Lakes Highway District MS4 Outfall Dry Weather Monitoring discharges were sampled and tested.

2024 Lakes Highway District Dry Inspection Discharge Testing Results						
	E. COLI BACTERIA (MPN/100mL)	TOTAL RESIDUAL CHLORINE (mg/L)	TOTAL PHOSPHORUS (mg/L)	pH	PHENOLICS (mg/L)	TOTAL SUSPENDED SOLIDS (mg/L)
PQL	1	0.01	0.001	6.5-9.0	0.05	1
OUTFALL 1	26.9	ND	**0.035**	7.93	ND	1
OUTFALL 3	6.2	0.01	**0.024**	7.73	ND	2
OUTFALL 4	1	ND	0.013	7.77	ND	1
OUTFALL 12	**361**	0.01	**0.052**	8.10	ND	8
OUTFALL 18	2	ND	0.007	7.36	ND	1
OUTFALL 19	**156**	ND	**0.019**	8.08	ND	2
OUTFALL 20	7.4	ND	**0.019**	8.12	ND	ND
OUTFALL 21	**>2420**	**0.02**	**0.157**	8.17	ND	12
OUTFALL 27	125	**0.02**	**0.024**	8.21	ND	7
OUTFALL 28	ND	ND	**0.013**	7.25	ND	1
OUTFALL 29	**172**	0.01	**0.040**	7.84	ND	10

Outfall 1

Outfall 1 is located in a residential area on Hayden Lake Road. In 2022 and 2023, Outfall 1 did not have flow present to test during dry weather inspections. At outfall 1, chlorine and phenolics were not detected. E. Coli was detected at 26.9 MPN/100 mL, which is less than the IDAPA standard of 126 MPN/100 ML. Total phosphorus was detected at 0.035 mg/L which equals 35 µg/L. This exceeds the water quality trigger of 7 µg/L listed in the 2020 Total Maximum Daily Loads of Lakes and Streams Located on or Draining to the Rathdrum Prairie. The pH of 7.93 is within the acceptable range of 6.5 to 9.

The total suspended solids (TSS) had a result of at 1 mg/L, but it is unknown how this TSS value compares to a turbidity of 25 NTUs. The inspector noted that the runoff appeared clear with no noticeable turbidity.

It appeared that runoff was likely groundwater or irrigation from uphill or adjacent residences. The sample was taken when weather had been extremely hot and people were irrigating more excessively than normal, which could have contributed to more runoff during the dry season than normal. The slight E. Coli is likely coming from forest sources or the ditch, as the value reported is too low to suspect a leaking drain field. We recommend testing this location again in 2025, if runoff is present. If E. Coli is still present in 2025, then further investigation may be necessary.

Outfall 3

Outfall 3 is located east of outfall 1, a residential area on Hayden Lake Road. In 2022 and 2023, Outfall 3 did not have flow present to test during dry weather inspections. At outfall 3, phenolics were not detected. Chlorine was detected, but minimally. E. Coli was detected at 6.2 MPN/100 mL, which is less than the IDAPA standard of 126 MPN/100 ML. Total phosphorus was detected at 0.024 mg/L which equals 24 µg/L. This exceeds the water quality trigger of 7 µg/L listed in the 2020 Total Maximum Daily Loads of Lakes and Streams Located on or Draining to the Rathdrum Prairie. The pH of 7.73 is within the acceptable range of 6.5 to 9.

The total suspended solids (TSS) had a result of at 2 mg/L, but it is unknown how this TSS value compares to a turbidity of 25 NTUs. The inspector noted that the runoff appeared clear with no noticeable turbidity.

It appeared that runoff was likely groundwater or irrigation from uphill or adjacent residences. The sample was taken when weather had been extremely hot and people were irrigating more excessively than normal, which could have contributed to more runoff during the dry season than normal. The slight E. Coli is likely coming from forest sources or the ditch, as the value reported is too low to suspect a leaking drain field. We recommend testing this location again in 2025, if runoff is present. If E. Coli is still present in 2025, then further investigation may be necessary.

Outfall 4

Outfall 4 is located in a residential area on Hayden Lake Road. In 2022 and 2023, Outfall 4 did not have flow present to test during dry weather inspections. At outfall 4, chlorine and phenolics were not detected. E. Coli was detected at 1 MPN/100 mL, which is less than the IDAPA standard of 126 MPN/100 ML. Total phosphorus was detected at 0.013 mg/L which equals 13 µg/L. This exceeds the water quality trigger of 7 µg/L listed in the 2020 Total Maximum Daily Loads of Lakes and Streams Located on or Draining to the Rathdrum Prairie. The pH of 7.77 is within the acceptable range of 6.5 to 9.

The total suspended solids (TSS) had a result of at 1 mg/L, but it is unknown how this TSS value compares to a turbidity of 25 NTUs. The inspector noted that the runoff appeared clear with no noticeable turbidity.

It appeared that runoff was likely groundwater or irrigation from uphill or adjacent residences. The sample was taken when weather had been extremely hot and people were irrigating more excessively than normal, which could have contributed to more runoff during the dry season than normal. The slight E. Coli is likely coming from forest sources or the ditch, as the value reported is too low to suspect a leaking drain field. We recommend testing this location again in 2025, if runoff is present. If E. Coli is still present in 2025, then further investigation may be necessary.

Outfall 12

Outfall 12 is adjacent to outfall 13 on East Hayden Lake Road in an area with residential development. In 2023, it was recommended to test the water at this outfall again in 2024 for E. Coli. If E. Coli is still present, it is recommended to further investigate the source. In 2024, E.Coli was detected at 362 MPN/100 mL, which is greater than the IDAPA Standard of 126 MPN/mL, but still not high enough to suspect cross connection to septic. Rather animal feces or dead animals in the forest may be the source.

In 2022 chlorine was detected but in 2023, chlorine was not detected. In 2024, chlorine was detected, but only minimally. Total phosphorus was detected at 0.052 mg/L which equals 52 µg/L. This exceeds the water quality trigger of 7 µg/L listed in the 2020 Total Maximum Daily Loads of Lakes and Streams Located on or Draining to the Rathdrum Prairie. The pH of 8.1 is within the acceptable range of 6.5 to 9. The total suspended solids (TSS) had a result of at 8 mg/L, but it is unknown how this TSS value compares to a turbidity of 25 NTUs. The inspector noted that the runoff appeared clear with no noticeable turbidity or odor.

Outfall 18

Outfall 18 is located right behind a fence leading to a dock on Hayden Lake Road. The area is residential. At outfall 18 chlorine and phenolics were not detected. E. Coli was detected at 2/100 mL, which is greater than the IDAPA Standard of 126/100 mL, but not high enough to indicate cross connection to septic. The inspector did not note an odor. Total phosphorus was detected at 0.007 mg/L which equals 7 µg/L. This meets the water quality trigger of 7 µg/L listed in the 2020 Total Maximum Daily Loads of Lakes and Streams Located on or Draining to the Rathdrum Prairie. The pH of 7.36 is within the acceptable range of 6.5 to 9. The total suspended solids (TSS) had a result of at 1 mg/L, but it is unknown how this TSS value compares to a turbidity of 25 NTUs. The inspector noted that the runoff

appeared clear with no noticeable turbidity.

Outfall 19

Outfall 19 is located slightly West of a dock and shed on Hayden Lake Road in a residential area. At outfall 19 chlorine and phenolics were not detected. E. Coli was detected at 156/100 mL, which is greater than the IDAPA Standard of 126/100 mL, but not high enough to indicate cross connection to septic. The inspector did not note an odor. Total phosphorus was detected at 0.019 mg/L which equals 19 µg/L. This exceeds the water quality trigger of 7 µg/L listed in the 2020 Total Maximum Daily Loads of Lakes and Streams Located on or Draining to the Rathdrum Prairie. The pH of 8.08 is within the acceptable range of 6.5 to 9. The total suspended solids (TSS) had a result of at 2 mg/L, but it is unknown how this TSS value compares to a turbidity of 25 NTUs. The inspector noted that the runoff appeared clear with no noticeable turbidity.

Outfall 20

Outfall 20 is located above a dock in a residential area on Hayden Lake Road. E. Coli was detected at 7.4/100mL, which is less than the IDAPA Standard of 126/100mL. Chlorine was not detected. Total phosphorus was detected at 0.019 mg/L which equals 19 µg/L. This exceeds the water quality trigger of 7 µg/L. The pH of 8.12 is within the acceptable range of 6.5 to 9. Phenolics were not detected. No suspended solids were detected.

Outfall 21

Outfall 21 is located in a residential area on Hayden Lake Road, east of Hayden Lake Marina. At outfall 21 phenolics were not detected. E. Coli was detected high at 2,420/100 mL, which far exceeds than the IDAPA Standard of 126/100 mL, but is not great enough to suspect illicit connection to septic. The inspector did not note an odor but did not some moss and algae present. Chlorine was detected slightly at 0.02 mg/L. Total phosphorus was detected at 0.157 mg/L which equals 157 µg/L. This exceeds the water quality trigger of 7 µg/L listed in the 2020 Total Maximum Daily Loads of Lakes and Streams Located on or Draining to the Rathdrum Prairie. The algae present in the inlet is likely the culprit of such a high phosphorus reading. The pH of 8.17 is within the acceptable range of 6.5 to 9. The total suspended solids (TSS) had a result of 12 mg/L, but it is unknown how this TSS value compares to a turbidity of 25 NTUs. The inspector noted that the runoff appeared clear with no noticeable turbidity.

Outfall 27

Outfall 27 is located on Avondale Loop Road in a residential area near Avondale Golf Course. There was substantial flow, which required follow up. Refer to the report in the appendix. It was eventually determined that the golf course was excessively irrigating, overflowing and pond, which then flowed into the outfall. No illicit discharge was detected. At outfall 27 chlorine was detected minimally at 0.02 mg/L. Phenolics were not detected. E. Coli was detected at 125/100 mL, which less than the IDAPA Standard of 126/100 mL. The inspector did not note an odor. Total phosphorus was detected at 0.024 mg/L which equals 24 µg/L. This exceeds the water quality trigger of 7 µg/L listed in the 2020 Total Maximum Daily Loads of Lakes and Streams Located on or Draining to the Rathdrum Prairie. The pH of 8.21 is within the acceptable range of 6.5 to 9. The total suspended solids (TSS) had a result of at 7 mg/L, but it is unknown how this TSS value compares to a turbidity of 25 NTUs. The inspector noted that the runoff appeared clear with no noticeable turbidity.

Outfall 28

Outfall 28 is located on Avondale Loop Road in a residential area near Avondale Golf Course. At outfall 28 chlorine, phenolics, and E.Coli were not detected. Total phosphorus was detected at 0.013 mg/L

which equals 13 µg/L. This exceeds the water quality trigger of 7 µg/L listed in the 2020 Total Maximum Daily Loads of Lakes and Streams Located on or Draining to the Rathdrum Prairie. The pH of 7.25 is within the acceptable range of 6.5 to 9. The total suspended solids (TSS) had a result of at 1 mg/L, but it is unknown how this TSS value compares to a turbidity of 25 NTUs. The inspector noted that the runoff appeared clear with no noticeable turbidity.

Outfall 29

Outfall 29 is located at the intersection of N. Avondale Loop Road, Thames, and Brighton Roads in an area with residential development and in close proximity to the Avondale Golf Course. In 2022 an d2023, outfall 29 also had runoff with phosphorus being the only water quality standard not met. Total phosphorus was detected at 0.040 mg/L which equals 40 µg/L. This exceeds the water quality trigger of 7 µg/L listed in the 2020 Total Maximum Daily Loads of Lakes and Streams Located on or Draining to the Rathdrum Prairie and is similar to the 2023 reading of 39 mg/L. The pH of 7.84 is within the acceptable range of 6.5 to 9. The total suspended solids (TSS) had a result of at 10 mg/L, but it is unknown how this TSS value compares to a turbidity of 25 NTUs. The inspector noted that the runoff appeared clear with no noticeable turbidity.

It appeared that the runoff was likely groundwater or irrigation from adjacent residences and the golf course. Illicit discharge was not suspected, and follow-up action is not recommended.

Planned Activities for 2025

The Lakes Highway District will do the following during the 2025 calendar year:

- Visually monitor the MS4 area during routine maintenance rounds.
- Screen all outfalls during July-September in accordance with the Dry Weather Screening Plan.
- Conduct additional screening in spring and fall during maintenance and monitoring.
- Document and report detected illicit discharges to Kootenai County, EPA and IDEQ in accordance with the Spill Response Plan.

5.5 Education, Outreach, and Public Involvement

To educate and involve members of the public to learn about pollutants in storm water and similarly significant issues, Lakes Highway District must conduct, or contract with other entities to conduct, an ongoing education, outreach, and public involvement program. The Highway District must also comply with applicable State and local public notice requirements when implementing any public involvement activities.

Within one year of the Permit effective date, LHD, PFHD, and ESHD must, at a minimum:

- ✓ Select at least one audience and focus its efforts on conveying relevant messages
- ✓ Distribute and/or offer at least eight (8) educational messages or activities over the permit term to selected audience(s)
- ✓ Begin to assess, and track, activities to gauge the audience's understanding of the relevant messages and adoption of appropriate behaviors.
- ✓ Target specific educational material to the construction/engineering/design community regarding construction site runoff control and permanent storm water controls.
- ✓ Maintain and advertise a publicly accessible website to provide all relevant SWMP materials.

Lakes Highway District will track the Public Education and Outreach efforts during the permit term and provide reports in the Annual Reports. The permit requires at least 8 educational messages or activities during the permit term. The permit requires an effort to assess the understanding of the relevant messages and adoption of appropriate behaviors by the target audience.

The North Idaho Highway Districts have already established a public education and outreach program during the last permit term, and they will continue to build upon through this permit term.

The target audiences have been children and families with the following outreach efforts:

Earth Day – We had a booth with interactive activity for children and families who attended the Earth Day event on April 20, 2024. The booth educated students about stormwater drainage systems and groundwater. Students learned where drinking water comes from, the definition of groundwater and stormwater, and how to prevent and reduce stormwater pollution. Photos from the event are below.

Silverwood Physics & Science Day – Local middle and high schools from Eastern Washington and North Idaho traveled to Silverwood Amusement Park to participate in Science and Physics Day on May 23, 2024, while also enjoying the amusement park. Students took part in educational activities such as visiting the stormwater education booth, creating rollercoaster models, and measuring area using a circle. Together with the IDEQ and the City of Coeur d'Alene, a representative from the Highway District ran the stormwater education booth. The booth educated students about stormwater drainage systems and groundwater. Students learned where drinking water comes from, the definition of groundwater and stormwater, and how to prevent and reduce stormwater pollution. Photos from the event are below.

Information on the Website
A flyer was placed on the website prior to Earth Day. The excerpts from the website are included in the appendix.

In 2015, the Highway District, wrote a letter of support and agreed to co-fund a "Learning Station" for the University of Idaho grant application to develop the "Cleaner. Water. Faster: Bi-State Interpretive Clean Water Trail" Interpretive Trail for the four corners area in Coeur d'Alene. The University of Idaho was successful in securing the grant. The design of the "Learning Station" was completed in 2018 and was installed by the City of Coeur d'Alene in the spring of 2019. The "Learning Station" for the Storm Water Pollution Prevention Interpretive Trail Project will be maintained as a cooperative effort with East Side Highway District, Post Falls Highway District, and Lakes Highway District (see picture of Learning Station in attached).

The Highway Districts were approached with an opportunity to develop a PSA through the University of Idaho's "Cleaner. Water. Faster." grant. On September 19, 2017, the video was filmed and in October of 2018 the video was completed and published on YouTube and linked by the University of Idaho website. The video has also been posted to the Lakes Highway District website.

To supplement our Public Outreach Stormwater Demonstrations, the three Highway Districts along with the City of Coeur d'Alene designed and produced two large banner displays for stormwater and pollution prevention education purposes.

Planned Activities for 2025

Lakes Highway District plans to perform the following Public Outreach and Education activities during the 2023 calendar year:

- Earth Day Stormwater booth
- Ramsey Elementary Field Trip Stormwater Pollution Prevention Presentation (if the City of CDA and Ramsey Elementary holds this event. They did not in 2024.)
- Silverwood Physics and Science Day Stormwater Pollution Prevention Presentation
- One public information brochure on the website.
- SEEP Field Guides distributed to all Contractors and Permit Applicants

6. UNIQUE PROVISIONS SPECIFIC TO LAKES, POST FALLS, AND EAST SIDE HIGHWAY DISTRICTS

6.1 Annual Compliance Evaluation

The annual report that is required by Part 6.4.2 of the NPDES Permit is accessible on the Lakes Highway District website at www.lakeshighwaydistrict.com

6.2 Alternative Control Measure Requests

No requests were made for Alternative Control Measures.

6.3 Adaptive Management Actions

There are no adaptive management actions to date.

APPENDIX