

# Storm Water Management Program

Written description as required by NPDES Permit #IDS028258



**Your Safety • Your Mobility  
Your Economic Opportunity**

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**Permittee Permit Number:** IDS028258

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# ACRONYMS

BMP – Best Management Practices

CWA – Clean Water Act

EPA – Environmental Protection Agency

ERP – Enforcement Response Policy

I – Interstate

IDEQ – Idaho Department of Environmental Quality

ITD - Idaho Transportation Department D2

IPDES- Idaho Pollutant Discharge Elimination System

MEP – Maximum Extent Practicable

MS4 – Municipal Separate Storm Sewer System

NPDES CGP – National Pollutant Discharge Elimination System Construction General Permit

PPBV – Plains, Plateaus, and Broad Valleys Water Quality Site Classification

SH – State Highway

SWMP – Storm Water Management Plan

TMDL – Total Maximum Daily Loads

UA – Urbanized Area

WLA – Waste Load Allocation

WPCM – Water Pollution Control Manager

WQS – Water Quality Standards

# 1. BASIC SWMP INFORMATION

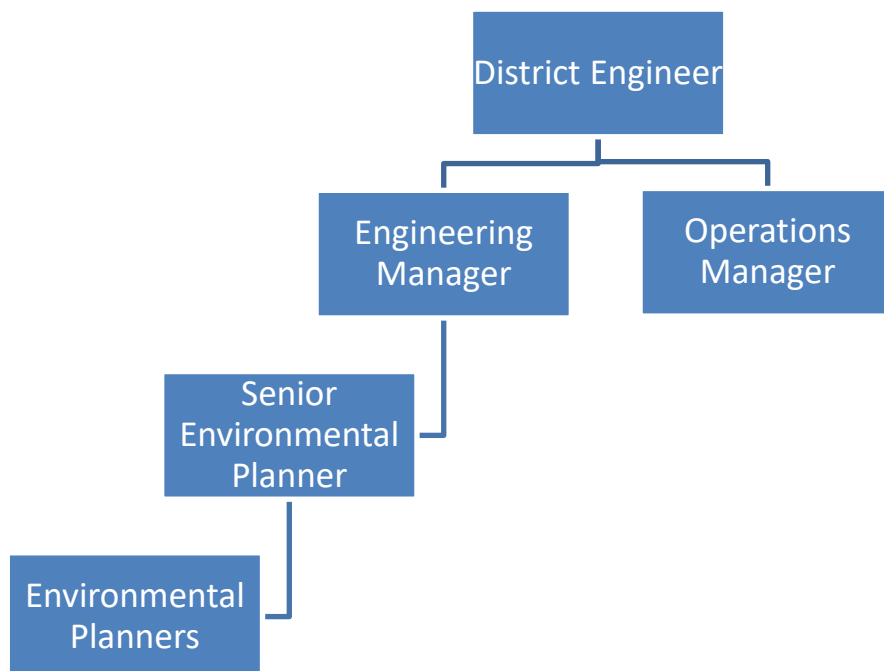
This Storm Water Management Program (SWMP) Document was developed by District 2 ITD to meet the terms and conditions of NPDES Permit Number IDS028258. The outline of the plan generally follows the Permit outline. The permit covers the Urbanized Areas (UA) as defined by the United States (US) census which in this case includes the larger community of Lewiston, Idaho. ITD's facilities includes the State Highways (SH) and Interstates through this UA.

## 1.1 Staff Organization

ITD has assigned staff who are responsible for the development and implementation of the SWMP. The District Administrator has full authority to operate and delegate within the ITD. The District Administrator is the only one who can sign the Permit. The District Administrator delegates all tasks associated with the SWMP to the Engineering Manager. The Program Manager oversees the SWMP development and implementation. The Engineering Manager also oversees design and construction projects while the Program Manager also oversees scoping and development of projects. Two Environmental Planners assist in development and implementation. The Operations Managers have responsibilities to oversee the maintenance throughout ITD and assist in implementation of the SWMP. The names and titles of those responsible for SWMP implementation are listed below.

District Engineer	-----	Doral Hoff
Engineering Manager	-----	Bob Schumacher
Operations Managers	-----	Jared Hopkins
Environmental Planner Senior	-----	Shawn Smith
Environmental Planner	-----	Neal Scott

An ITD organizational chart by title is shown below in Figure 1:



## 1.2 Permit Area

The permit is for the Lewiston Urbanized Area (UA) which is part of the larger Lewis Clark Valley and Lower Snake - Asotin watershed. The Snake River (flowing south to north) delineates the state boundary between Washington and Idaho and bisects the UA, with City of Clarkston on west side and City of Lewiston on the east side. The lowest gradients occur along the riverbank and at the confluence of the Snake and Clearwater River where land is zoned for light and heavy industry. Elevation increases southwest through residential and commercial development in Lewiston City proper and continues to rise after reaching the rural areas outside of City limits. Land north of the Clearwater River and east of the Snake River is zoned for a port, and heavy industrial and commercial spaces. The approximate population in the City of Lewiston is 35,000<sup>1</sup>. The permit area receives approximately 12.31 inches of rain fall per year<sup>2</sup>. There are several streams nearby: Lindsey Creek, Tammany Creek, and Hatwai Creek. ITD does not operate any outfalls to Lindsey or Tammany Creek. The drainage area for Lindsey creek is approximately 22.14 square miles and for Hatwai Creek it is approximately 29 square miles.

ITD has 15 outfalls which discharge into the Clearwater River.

ITD's storm sewer system related to this permit includes those systems which it owns and highways it maintains. The highways are: State Highway (SH) 128; U.S. Highway 12 and 95. ITD also maintains an interchange connecting the highways. A state statute requires local jurisdictions to maintain systems which run through their jurisdiction when the roadway is an urban section (Idaho Code Title 40-502).

A map of the permit area is shown below in Figure 2 (Figure 2a is the Legend for Figure 2). To zoom in on the map you can go to the following address: [2010 Census - Urbanized Area Reference Map](#) . A map of the relevant ITD maintained roadways is shown in Figure 3. To zoom in on the map you can go to the following address: [ATR/WIM Stations App \(arcgis.com\)](#)

1. [U.S. Census Bureau QuickFacts: Lewiston city, Idaho](#)
2. [Climate Lewiston - Idaho and Weather averages Lewiston \(usclimatedata.com\)](#)

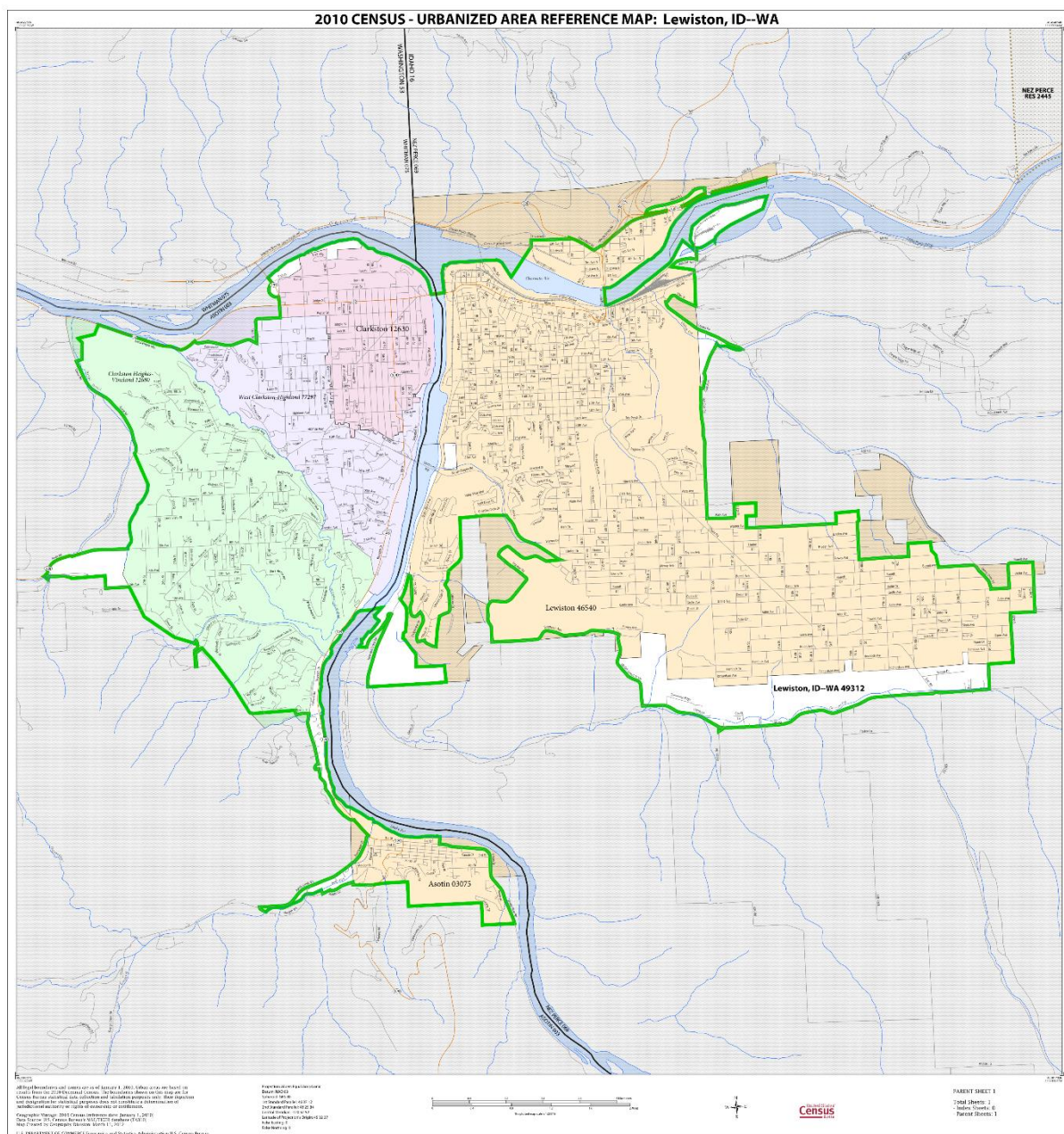


Figure 2

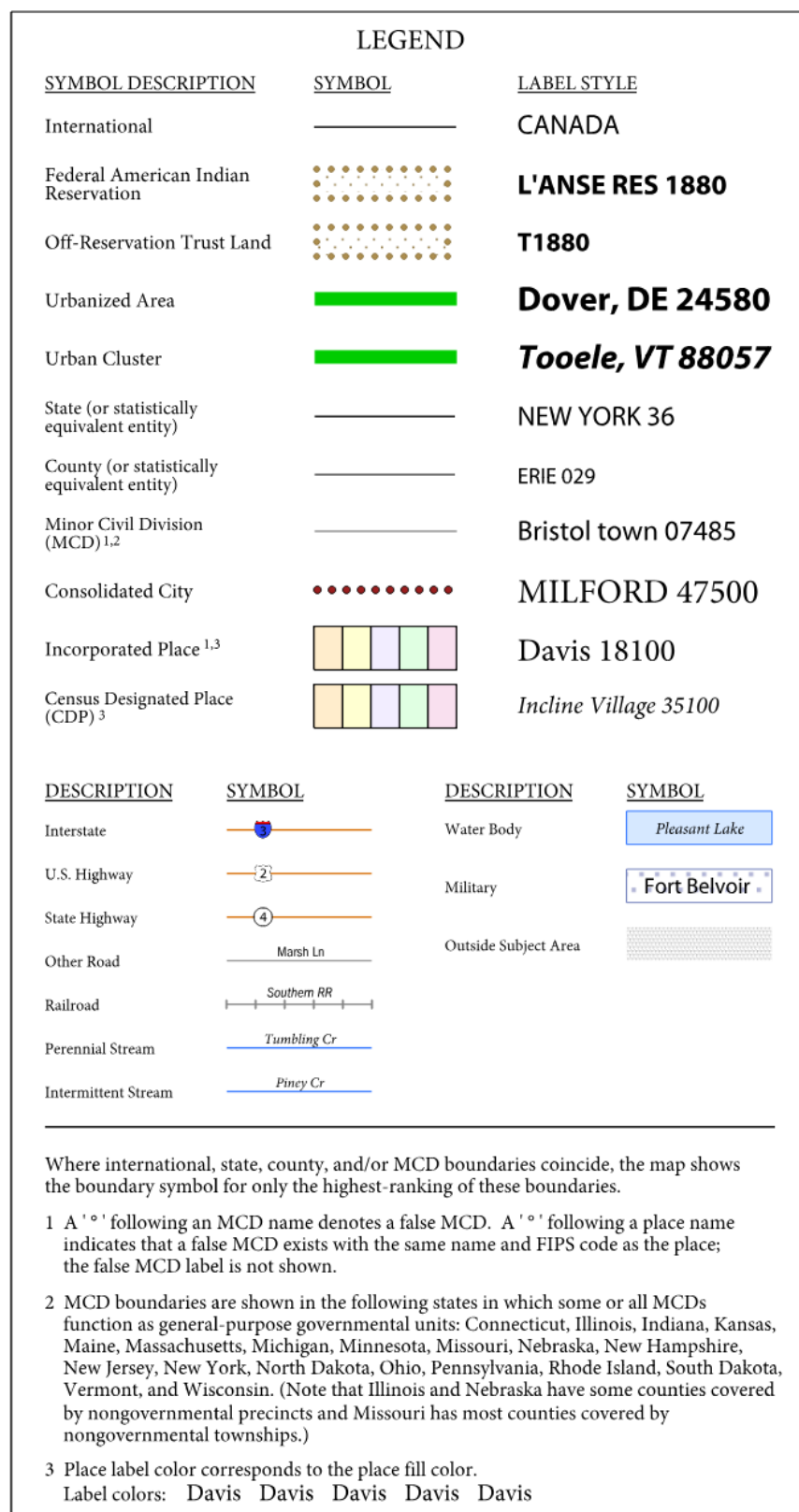


Figure 2a



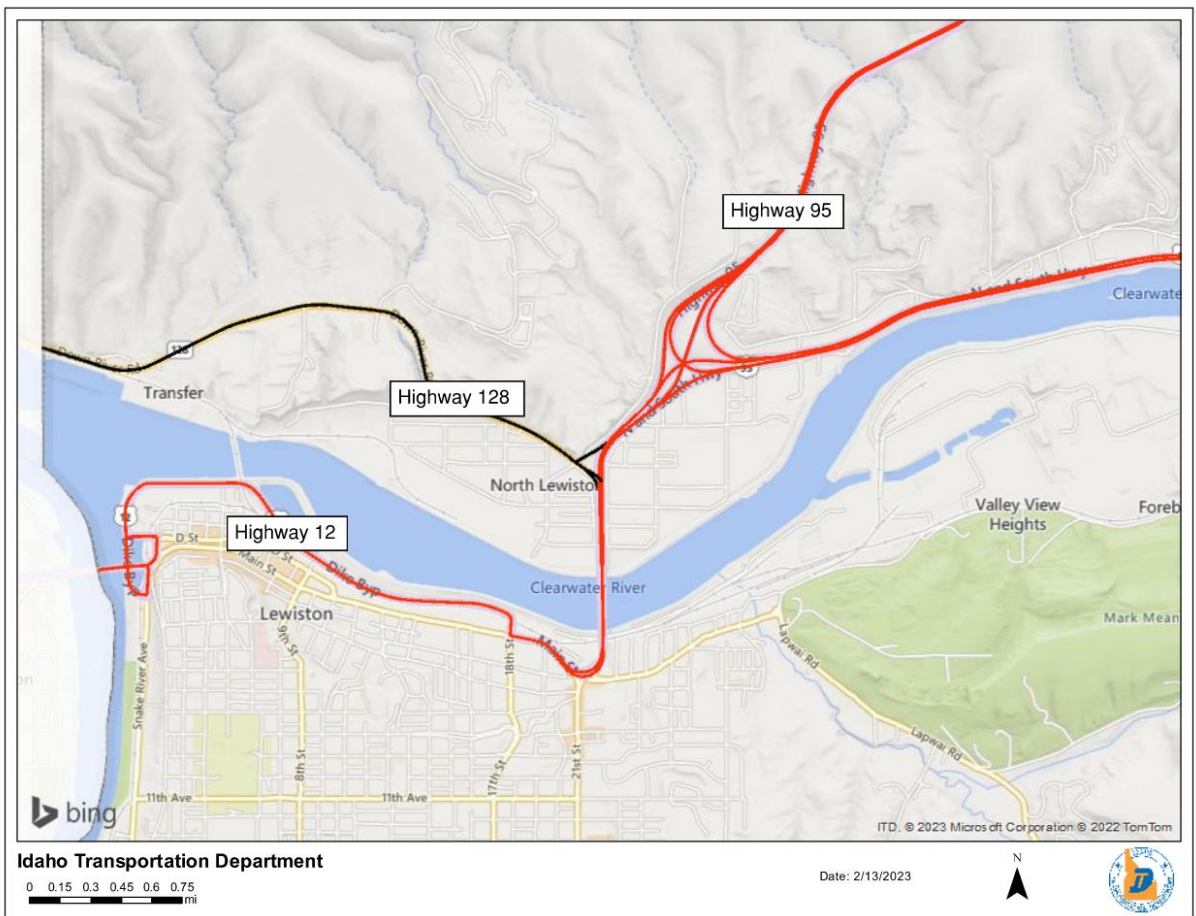


Figure 3



## 1.3 Receiving Water

Below is a list of the relevant receiving water bodies in the vicinity of the MS4, including their water quality status from IDEQ's 2022 Integrated Report and the number of outfalls that discharge to each stream.

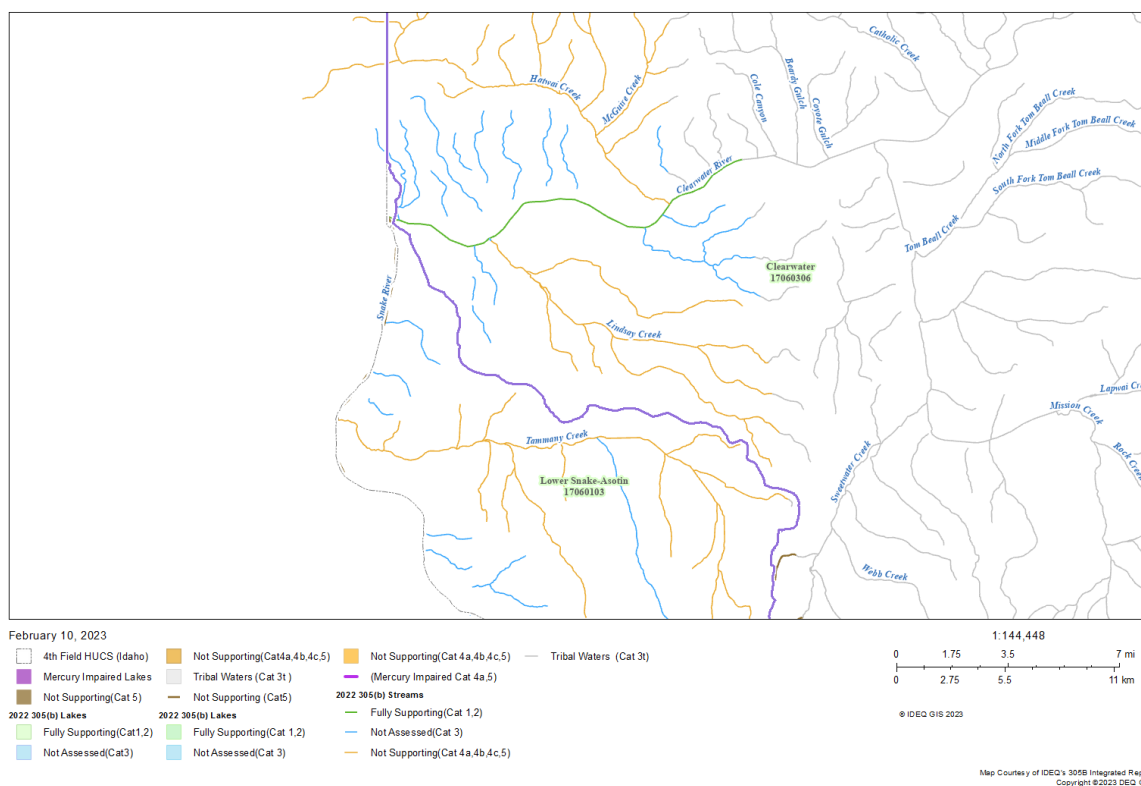
Table: Receiving Water Summary IDEQ

Receiving Waterbody Segments	WQS Classification	Impairment/Pollutant of Concern	TMDLs? (Yes/No)	Applicable WLAs (Yes/No)	No. of Discharging Outfalls
Lindsey Creek - ID17060306CL003	Not Supporting <sup>6</sup>	E-Coli, Sediment, Nutrients <sup>2</sup>	Yes <sup>1</sup>	Yes <sup>2</sup>	0
Hatwai Creek - ID17060306CL067	Not Supporting <sup>6</sup>	E-Coli, Nutrient, Temperature <sup>3</sup>	Yes <sup>1</sup>	Yes <sup>3</sup>	0
*Tammany Creek ID17060103SL014	Not Supporting <sup>6</sup>	E-Coli, Sediment, Nutrients <sup>4</sup>	Yes <sup>4</sup>	Yes <sup>4</sup>	0
Clearwater River - ID17060306CL001_07	Fully Supporting <sup>6</sup>	None Listed <sup>5</sup>	No <sup>5</sup>	No <sup>5</sup>	15
Snake River- ID17060103SL001_08	Not Supporting <sup>6</sup>	None Listed <sup>5</sup>	No <sup>5</sup>	No <sup>5</sup>	0

\*Tammany Creek is designated as an intermittent stream

The WQS classification is part of DEQ's surface water assessment. There are 5 categories which describe the degree that a body of water supports beneficial uses. Category 4 has subcategories: 4a, 4b, 4c. Categories 4a and 5 require a TMDL.

### Idaho DEQ Final 2022 305B Integrated Report



1. [Clearwater River Subbasin | Idaho Department of Environmental Quality](https://www2.deq.idaho.gov/admin/LEIA/api/document/download/15709)
2. <https://www2.deq.idaho.gov/admin/LEIA/api/document/download/15709>
3. <https://www2.deq.idaho.gov/admin/LEIA/api/document/download/11802>
4. <https://www2.deq.idaho.gov/admin/LEIA/api/document/download/12069>
5. [Total Maximum Daily Loads | Idaho Department of Environmental Quality](#)
6. [Idaho DEQ FINAL 2022 Integrated Report](#)

In addition to IDEQ's integrated report, the EPA has a discharge mapping tool that will list the catchments and receiving water bodies for a given area of interest (AOI). In the AOI for this permit, there were 20 catchments identified along with 8 assessments. The map is at [EPA's Stormwater Discharge Mapping Tools | US EPA](#).

## 1.4 SWMP Information and Statistics

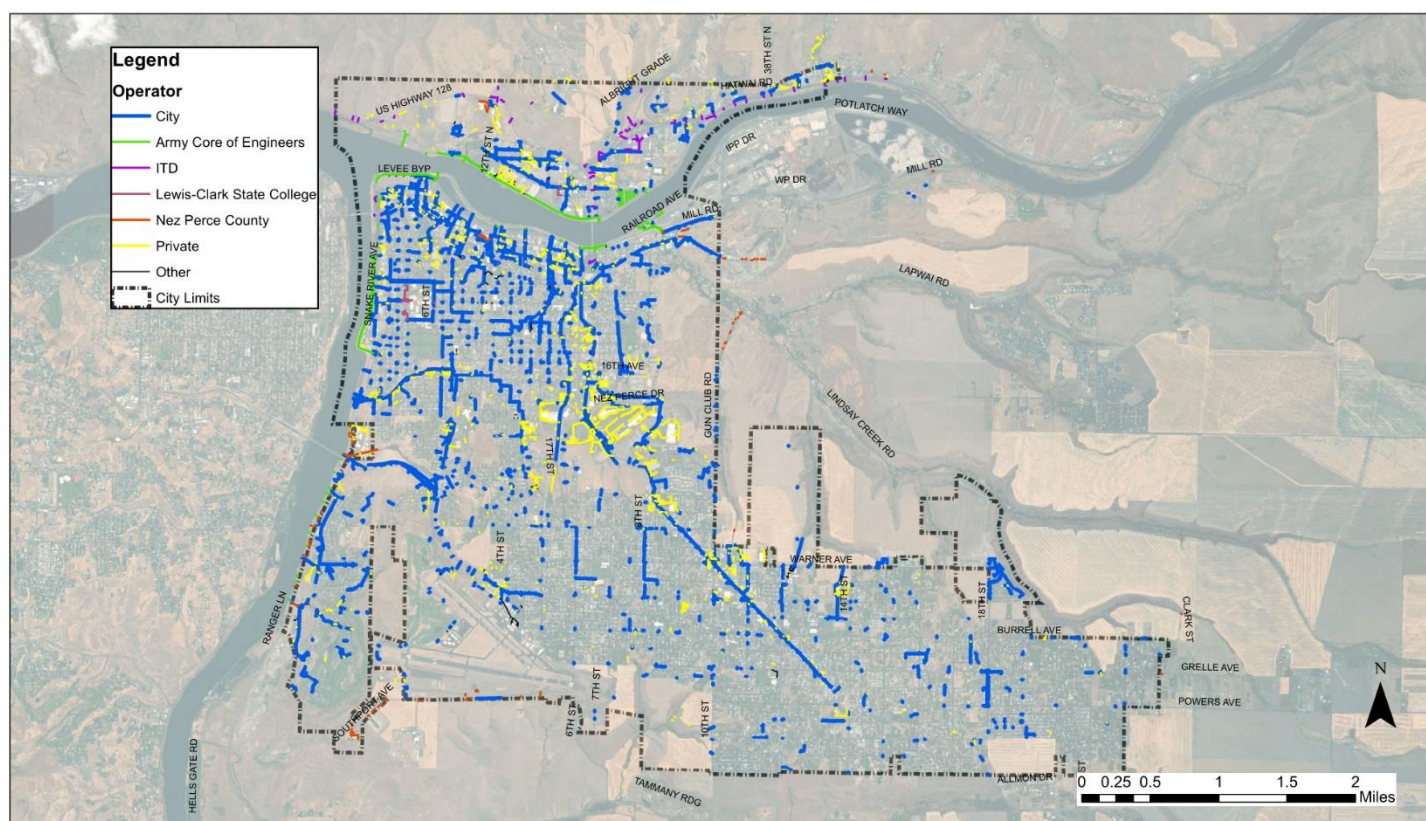
IDAPA 58.01.02 specifies the water quality standards that must be met in the state of Idaho. To maintain compliance, the Permittee shall regularly employ Best Management Practices where applicable and perform all associated inspections. The Permittee must maintain a method of gathering tracking and using SWMP information to set priorities and assess Permit compliance.

## 1.5 Transfer of Ownership, Operational Authority, or Responsibility to SWMP Implementation

The Permittee must implement the required SWMP control measures of Permit IDS028258 in all new areas added or transfer to the Permittee's MS4 as expeditiously as practicable, not later than one (1) year from addition of the new areas. New construction that ties into stormwater infrastructure within the MS4 permit area shall also meet all stormwater requirements outlined in stormwater management resolution 80-100.

# 2. MAP OF THE SEPARATE STORM SEWER SYSTEM

ITD owned sewer system infrastructure in the MS4 permit area is shown below. For a description of the MS4 permit area, refer back to section 1.2. ITD is working on mapping outfall data in a web-based GIS application for public viewing. Refer to section 5.4 for more information.



Existing System - Pipe Ownership

Stormwater Master Plan



Figure 1.3

City of Lewiston, ID  
September 2018

## 3. TARGETING POLLUTANTS OF CONCERN

### 3.1 Monitoring/Assessment of MS4 Discharges to Impaired Waters

The following table describe ITD's quantitative monitoring/assessment and pollutant reduction activities designed to assess and control impairment pollutants in our MS4 discharges to Hatwai, Tammany, and Lindsey Creek as well as the Snake and Clearwater Rivers.

3.1.1 Data Logging	ITD tracks their information with multiple databases, spread sheets, and forms. The ITD will track website use including downloads and comments. ITD will keep construction and inspection records which document expectations, performance, enforcement, and results. ITD will also maintain records from storm water complaints and how they are addressed.
3.1.2 Data Acquisition	<p>Monitoring locations will be selected to enable monitoring of stormwater sediment loads from the Clearwater and Snake Rivers; partition loads between urban stormwater sources, agricultural return flow and sources from upstream of the urban area.</p> <p>Members of the general public will not be engaged in the monitoring due to the technical nature of the data acquisition; however, the monitoring may be discussed at regular outreach events.</p>
3.1.3 Data Analysis	Data will be analyzed annually for trends, with a summary in each Annual Report beginning in 2023. It will include raw data, as well as a visual and narrative summary of the data interpretation, any quality assurance issues, and a narrative discussion comparing this data with any historical information, as appropriate.
3.1.4 Monitoring and Assessment	<p>The ITD will submit a Monitoring/Assessment Plan that is designed to quantify, at a minimum, pollutant loadings from the MS4 into the Clearwater and Snake Rivers for sedimentation/siltation.</p> <p>The ITD desires to contract with local jurisdictions to implement the monitoring plan. This includes monitoring stormwater turbidity and suspended sediment loads, as well as the effects any stormwater treatment on those loads.</p>
3.1.5 Publication of Findings	ITD will post the Annual Report and SWMP on the ITD Stormwater page for public access and submit them to the IDEQ as the permitting authority for the first permit year. The ITD has reviewed the requirements for the first permit term and have met the conditions of the permit.

### 3.2. Pollutant Reduction Activities

See section 5.5 Education, Outreach and Public Involvement

## 4. LEGAL AUTHORITY AND ENFORCEMENT

ITD does not have formal ordinance authority under Idaho law. Neither does ITD have civil enforcement authority. ITD relies on contract specifications and the Idaho Transportation Department 2018 Standard Specifications for Highway Construction to meet permit requirements. ITD manages and maintains state highways under Idaho code Title 40 Highways and Bridges, and Idaho Administrative Code IDAPA 39; ID 40-502 Maintenance of State highways; ID 40-310(3) Board control of ITD and statewide transportation system, and IDAPA 39.03.42 Rules Governing Highway Right-of- Way Encroachments. ITD relies on the legal authorities presented in the following table.

<b>1. To prohibit and eliminate illicit discharges to the MS4: (3.2.3)</b>	<p>Through IDAPA 39.03.42 ITD controls third-party activities on highway rights-of- way through conditions associated with encroachment permits. An approved right- of-way encroachment permit is required by outside entities for all work within state highway right-of-way (IDAPA 39.03.42, 600.01) and Best Management Practices are required to control erosion and sediment (IDAPA 39.03.42, 600.01).</p> <p>Unauthorized and nonstandard encroachments are prohibited and can be removed, or use may be suspended (IDAPA 39.03.42, 800.02). This is the provision that gives ITD the authority to control illicit discharges and illegal connections to the MS4.</p>
<b>2. To control the discharge of spills, dumping or disposal of materials other than storm water to the MS4:</b>	<p>Through IDAPA 39.03.42 ITD controls third-party activities on highway rights-of- way through conditions associated with encroachment permits, which are defined as any authorized or unauthorized use of highway rights-of-way or easements...”</p> <p>Encroachment permits are conditioned to require environmental compliance, including implementation of applicable BMPs. Idaho Statute Title 18 Chapter 39 prohibits dumping, littering, and placement of debris or any waste on highways.</p>
<b>3. To control the discharge of storm water and pollutants from land disturbance and development, both during the construction phase and after site stabilization has been achieved</b>	<p>Standard Specifications for Highway Construction Section 107.17; Operations Manual, and Best Management Practices Manual.</p> <p>Intergovernmental Agreement for Roles and Responsibilities under the NPDES Municipal Stormwater Permit.</p>
<b>4. To control the contribution of pollutants from one MS4 to another interconnected MS4;</b>	<p>Standard Specifications for Highway Construction Section 107.17; Operations Manual, and Best Management Practices Manual.</p>
<b>5. To require local compliance with such requirements; and</b>	<p>Standard Specifications for Highway Construction Section 107.17.</p>
<b>6. To carry out all inspection, surveillance, and monitoring procedures necessary to determine compliance and noncompliance with the Permit.</b>	<p>Idaho Code Section 40-310 (3) vests the Idaho Transportation Board with the authority, control, supervision, and administration of the Idaho Transportation Department. The Board shall “locate, design, construct, reconstruct, alter, extend, repair, and maintain state highways, and plan, design, and develop statewide transportation systems”. This provision gives ITD the mechanism to carry out inspection, surveillance, and monitoring procedures to determine compliance and noncompliance with the permit.</p>



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

### 5.1 Construction Site Runoff Control

*To control the discharge of storm water and pollutants from land disturbance during the construction phase ITD must:*

- ✓ Require appropriate erosion, sediment, and waste management requirements for construction site activity that results in land disturbance of 5,000 square feet (ft<sup>2</sup>) or more.
- ✓ Establish installations 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 are trained to conduct these activities.

ITD requires construction site operators to control erosion and waste at construction sites disturbing 1 acre or more. ITD has established installation and use guidelines for erosion, sediment, and waste management during all phases of construction activity.

Contract language is placed in the construction contracts which requires contractors to follow local, state, and federal regulations for control of erosion, sediment, and waste pertaining to ITD projects. ITD implements best management practices based on the ITD Best Management Practices Manual. To support effective implementation of the Construction Site Stormwater and Erosion and Sediment Control requirements, the following manuals are utilized by Permittee staff implementing the program.

Idaho Transportation Department Best Management Practices Manual

<https://itd.idaho.gov/env/?target=resources/>

Standard Specifications for Highway Construction, Sections 107.17, 212, 620, and 621

<https://itd.idaho.gov/business/?target=construction-resources#standard-specifications-for-highway-construction>

ITD conducts pre-construction site plan reviews for all projects. ITD maintains policy that requires all projects to have sediment and erosion control protocols in place during construction. Any ITD project must either have a Pollution Prevention Plan (PPP) or Stormwater Pollution Prevention Plan (SWPPP). Each PPP or SWPPP is reviewed prior to construction by a qualified individual and documentation of the review process is tracked. ITD specifications require stormwater plans be approved by ITD staff prior to commencing construction.

<p><b>1. ITD informs a construction project proponent to obtain the NPDES Construction General Permit coverage for sites disturbing one acre or more-</b></p>	<p>If a project disturbs over 1 acre and discharges to Waters of the US, the project requires a National Pollutant Discharge Elimination System Construction General Permit (CGP). The requirement to obtain the CGP is put in the construction contract. If a project exceeds 1 acre of ground disturbance during construction a CGP must be obtained. Erosion and Sediment Control Plans are required on project that do not exceed 1 acre and discharge into Waters of the US. Both ITD and the contractor are required to apply for the project.</p>
<p><b>2. ITD enforces its own local erosion, sediment, and waste management control requirements on construction sites disturbing at least 1 acre or more-</b></p>	<p>The ITD does not have civil enforcement authority, so it relies on contractual language which requires adherence to local, state, and federal regulations. Projects are inspected on a regular basis for proper installation of BMP's and implementation of the Storm Water Pollution Prevention Plan (SWPP). Maintenance needs are documented and corrected within 24 hours. Potential violations of the Clean Water Act (CWA) are reported within 24 hours to the Idaho Department of Environmental Quality (IDEQ). All waste materials are disposed of per local and state standards.</p>
<p><b>3. Construction sites are prioritized for inspection-</b></p>	<p>The ITD has a full construction staff who are trained to inspect CGP projects. These Water Pollution Control Managers (WPCM) and Inspectors are assigned discrete projects to inspect within their current workload ability; therefore, all projects get inspected in a timely manner. Prioritization greatly depends on the project location, slope, drainage patterns, soil conditions, precipitation, temperature, etc. Additionally, if assistance is requested, the ITD Environmental Planners can visit the construction sites to provide input and recommendations for adherence to the permit requirements.</p>
<p><b>4. ITD Enforcement Response Policy (ERP)-</b></p>	<p>ITD does not have an ERP for construction projects. ITD does not have civil enforcement ability so we rely on contract language, permit requirements, and regulatory agencies as appropriate for enforcement actions. ITD does have robust contract language to address adherence to the CGP. Needed corrective actions are recorded and corrected. Potential violations of the CWA are reported within 24 hours to the IDEQ. Corrections are made within 24 hours.</p>

ITD Operations and Engineering staff complete required training on basic environmental compliance and pollution prevention as new employees. ITD District and HQ trainers manage the environmental training and certification program for ITD. ITD maintains its own stormwater training program for ITD staff titled NPDES inspector training course 3.07. Any ITD inspector must hold a current ITD certification to inspect an ITD project. ITD also requires any contractor working on an ITD project to hold proper stormwater training, including ITD's Water Pollution Control Manager (WPCM) Certification. More detail can be found on the ITD Storm Water Page: [https://itd.idaho.gov/env/?target=stormwater#stormwater-inspector- requirements](https://itd.idaho.gov/env/?target=stormwater#stormwater-inspector-requirements).



## 5.2 Storm Water Management for Areas of New Development and Redevelopment

ITD will implement and enforce a program to control stormwater runoff from new development and redevelopment projects that result in land disturbance from one or more acres (or are part of a larger common plan of development over one acre). This program must apply to private and public sector development, including roads and streets. The program must ensure that permanent controls or practices are utilized at each new development and redevelopment site to protect water quality.

To control the discharge of storm water and pollutants from land disturbance and development, after construction is completed, ITD 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 stormevent.
  - 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 stormwater 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.

ITD maintains a policy that requires all projects to have sediment and erosion control protocols in place during construction. Any ITD project must either have a Pollution Prevention Plan (PPP) or Stormwater Pollution Prevention Plan (SWPPP). Each PPP or SWPPP is reviewed prior to construction by a qualified individual and documentation of the review process is tracked. ITD specifications require stormwater plans be approved by ITD staff prior to commencing construction.

ITD design development and construction follow the ITD Roadway Design Manual and applicable federal, state and local requirements for stormwater facility design to provide permanent controls of the discharge of stormwater and pollutants from land disturbance and development. This activity is overseen by staff in the District Engineering and Environmental Departments and HQ Bridge Section. ITD invites participation by local jurisdictions in design reviews for projects developed within the MS4 area.

The operation and maintenance of public stormwater facilities within the MS4 area are achieved as per state- local agreement and in accordance with the ITD Operations Manual, BMP Manual and engineering standards.

ITD design development and construction follow the ITD Roadway Design Manual and applicable federal, state and local requirements for stormwater facility design to provide permanent controls of the discharge of stormwater and pollutants from land disturbance and development. This activity is overseen by staff in the District Engineering and Environmental Departments and HQ Bridge Section. The operation and maintenance of public stormwater facilities within the MS4 area are achieved as per state-local agreement. Work by state forces complies with applicable federal, state and local requirements, the ITD Operations Manual and as directed by ITD engineering staff. Various District staff from Operations, Planning (including GIS Analyst) and Engineering, in coordination with City staff, contribute to maintaining the stormwater facility inventory for ITD within the MS4 area.

### 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, ITD 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. The prioritization of inspections are based on functionality of the catch basin, how direct the inlet connection is to Waters of the United States, past inspection logs.
- ✓ Maintain or cleans catch basins based on those inspections,
- ✓ If applicable, maintain Operation and Maintenance (O&M) Procedures for Streets, Roads, Highways and Parking Lots, including:
  - 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;
- ✓ Uses BMP's 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.

The Permittees must maintain their MS4 and related facilities to reduce the discharge of pollutants from the MS4 to the Maximum Extent Practicable (MEP). All Permittee-owned and operated facilities must be properly operated and maintained. This maintenance requirement includes, but is not limited to, structural stormwater treatment controls, storm sewer systems, streets, roads, parking lots, snow disposal sites, waste facilities, and street maintenance and material storage facilities.

ITD maintains their MS4 and related facilities to reduce the discharge of pollutants from the MS4 to the MEP. All Permittee-owned and operated facilities must be properly operated and maintained. This maintenance requirement includes, but is not limited to, structural stormwater treatment controls, storm sewer systems, streets, roads, parking lots, snow disposal sites, waste facilities, and street maintenance and material storage facilities.

The operation and maintenance of public roadways and stormwater facilities within the MS4 area are achieved as per state-local agreement and in accordance with ITD's Operations Manual, ITD BMP Manual, and current engineering standards.

The operation and maintenance of public roadways and stormwater facilities within the MS4 area are achieved as per state-local agreement and in accordance with ITD's Operations Manual, ITD BMP Manual, and current engineering standards.

The street sweeping management plan will be added to SWMP or permittee's website. This includes a map of all streets that discharge to the MS4 and their street sweeping frequency, a description of all street sweeping activities including types of sweepers used, lane miles swept, general schedule by sweeping frequency, and weight of materials collected.

ITD aims to minimize risk and potential pollution from pesticide, herbicide and fertilizer applications. Only staff with ISDA licensure for chemical applicators can plan, initiate and supervise pesticide and herbicide spraying. All contracts and state forces work are required to comply with applicable federal, state and local requirements and to follow manufacturer instructions and BMPs for pesticide, herbicide and fertilizer applications.

ITD District 2 operates one maintenance yard which includes material storage, equipment storage, and vehicle maintenance areas. While the ITD facilities do not drain to Waters of U.S., they are managed in accordance with pollution prevention best practices as per ITD Operations Manual and any applicable federal, state and local requirements within the permit area.

ITD complies with applicable federal, state, and local requirements, the ITD Operations Manual, and ITD BMP Manual on litter control. ITD's Maintenance Yard contracts with the local jurisdiction for garbage disposal and recycling services.

ITD operates an Adopt-a-Highway Program where volunteers pick up litter off the state highways and the interstate. More information about this program can be found on the ITD website.

#### Intended Compliance Schedule

- Update SWMP with sweeping management plan by April 3, 2025.

## **5.4 Illicit Discharge Detection and Elimination**

The ITD Standard Specifications for Highway Construction requires compliance with all applicable local, state, and federal laws, ordinances, regulations, orders and decrees, which would include detection, reporting and elimination of illicit discharges into the MS4 under the NPDES program and associated local ordinances. The ITD BMP Manual directs state forces and contractors in the identification of and actions to address illicit discharges (NS-6 Illicit Connection/Illegal Dumping or Discharge).

Spill reporting and response is handled as part of project contract requirements, ITD BMP Manual Waste Management chapters, and as per applicable codes and ordinances where the state roadway facility is located.

ITD monitors and controls activities that occur within the highway right-of-way of highways 128, 95 and 12. There are no private parcels that have direct access to or connect with the highways. ITD does not regulate land uses or establish storm water regulatory policy on private land adjacent to the right-of-way. While there is some exposure to possible acts of illicit discharges within the right-of-way, public access to highways 128, 95 and 12 are highly visible and restricted, which reduces the likelihood of the illicit discharges. ITD's illicit discharge monitoring program involves the continuation of surveillance efforts provided by ITD maintenance staff and other agency representatives as they travel through or maintain these roadways. Additionally, ITD will evaluate the general condition of the MS4 water quality conditions during sampling events and note any unusual conditions or special concerns related to the potential for illicit discharges to the system.

#### Intended Compliance Schedule

- Submit Monitoring/Assessment Plan by May 15, 2023
- No less than once per year, Permittee will self-evaluate compliance with Permit
- Submit Summary of Final Monitoring/Assessment Reports by April 3, 2025

Mapping of the ITD's MS4 system is ongoing. Mapping is being verified and outfalls confirmed. The 15 outfalls noted above are those ITD provided EPA based on the existing maps. As the mapping gets updated the number outfall locations will be updated as well. The Maps of the ITD MS4 Storm Water Infrastructure can be seen at the following address:

<https://itd.idaho.gov/env/?target=stormwater>

#### Intended Compliance Schedule

An Illicit Discharge Management Program will be completed by April 3, 2025.

- Illicit Discharge Complaint and Response Program
- Dry Weather Outfall Screening Program
- Illicit Discharge Training

## **5.5 Education, Outreach, and Public Involvement**

To educate and involve members of the public about pollutants in storm water and similarly significant issues, ITD must conduct, or contract with other entities to conduct, an ongoing education, outreach, and public involvement program. ITD 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, ITD 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.

The ITD has developed or contributed in the development of several educational materials for distribution to the public and/or entities we work with to educate them about how to keep stormwater clean and the importance of doing so. These materials are noted below and will be located on the ITD public website in a downloadable format as they become available. Some materials are selected for printing and distribution in public meetings; others are used in construction meetings, and training.

The ITD has determined the following target audiences and associated topics are most relevant to our agency:

#### **A. General Public**

- Litter and trash control.
- Impact of illicit discharges and how to report them.

#### **B. Construction/Development**

- General impacts of stormwater flows into surface water, and appropriate actions to prevent adverse impacts.
- Impacts from ground disturbing activities and appropriate techniques to avoid adverse impacts.
- Internal and external stormwater pollution control plan development, review, implementation, and enforcement training.

C. Elected Officials, Land Use Policy and Planning Staff

- General impacts of stormwater flows into surface water, and appropriate actions to prevent adverse impacts.
- Define MS4 and ITD's roles and responsibilities.

ITD has begun to develop/distribute education and outreach materials related to construction and development on October 1, 2021. An erosion and sediment control field guide is being updated which shows appropriate uses of BMP's. This field guide is being developed for distribution in training classes and to construction contractors. ITD intends to translate the booklet into Spanish to reach that community. Additionally, various pamphlets and fliers will be made available for download through the ITD stormwater website.

ITD D2 will assess, track, and gauge the success of our educational materials to target audiences by the number of materials distributed or offered, status of the change in the target audience over time, and noting any positive or negative feedback related to the topics throughout the permit period.

ITD maintains a publicly accessible website located at <https://itd.idaho.gov/env/?target=stormwater>. ITD will actively maintain and update the website. The website will provide links to downloadable stormwater educational and outreach materials in addition to providing information about the ITD's stormwater program including: contact information, available training, links to other MS4 Permittees in Nez Perce County, Storm Water Management Program, and annual reports.

ITD has established contacts with other MS4 Permittees for information sharing.

Throughout the year the ITD may modify the materials, methods of distribution, and target area to best suited the audiences. The topics and selected audiences will be determined by those in charge of the ITD MS4 program. As the education and outreach materials are completed, they will be provided in the Annual Report.

Intended Outreach Schedule

- A description of selected pollutant reduction activities will be provided May 15, 2023 with the year 2 report.
- Implementation of at least two pollutant reduction activities is due April 3, 2025.

## 6. UNIQUE PROVISIONS

### 6.1 Annual Compliance Evaluation

Vacant

### 6.2 Alternative Control Measure Requests

Vacant

### 6.3 Adaptive Management Actions

Vacant