

# Storm Water Management Program

Written description as required by NPDES Permit #IDS-0282223



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

*Idaho Transportation Department, District 1  
600 W. Prairie Avenue,  
Coeur d'Alene, Idaho*

*Contact Information:  
Ryan Hawkins  
208-772-1200  
Website:  
<https://itd.idaho.gov/d1/>*

**Permittee Permit Number:** IDS-028223

# CONTENTS

CONTENTS .....	1
ACRONYMS .....	2
1. BASIC SWMP INFORMATION .....	3
1.1 Staff Organization .....	3
1.2 Receiving Water.....	3
1.3 SWMP Information and Statistics.....	4
1.4 Transfer of Ownership, Operational Authority, or Responsibility to SWMP Implementation.....	4
2. MAP OF THE SEPARATE STORM SEWER SYSTEM.....	4
3. TARGETING POLLUTANTS OF CONCERN.....	11
3.1 Monitoring/Assessment of MS4 Discharges to Impaired Waters.....	11
3.2. Pollutant Reduction Activities .....	11
4. LEGAL AUTHORITY AND ENFORCEMENT.....	11
5. STORM WATER CONTROL MEASURES TO REDUCE POLLUTANTS TO THE MAXIMUM EXTENT PRACTICABLE.....	12
5.1 Construction Site Runoff Control .....	12
5.2 Storm Water Management for Areas of New Development and Redevelopment.....	13
5.3 Pollution Prevention/Good Housekeeping for MS4 Operations.....	15
5.4 Illicit Discharge Detection and Elimination.....	16
5.5 Education, Outreach, and Public Involvement.....	17
5.6 Inventory and Management of Street / Road Maintenance Materials.....	18
6. UNIQUE PROVISIONS.....	18
6.1 Annual Compliance Evaluation.....	18
6.2 Alternative Control Measure Requests .....	18
6.3 Adaptive Management Actions.....	18

## 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 D1

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

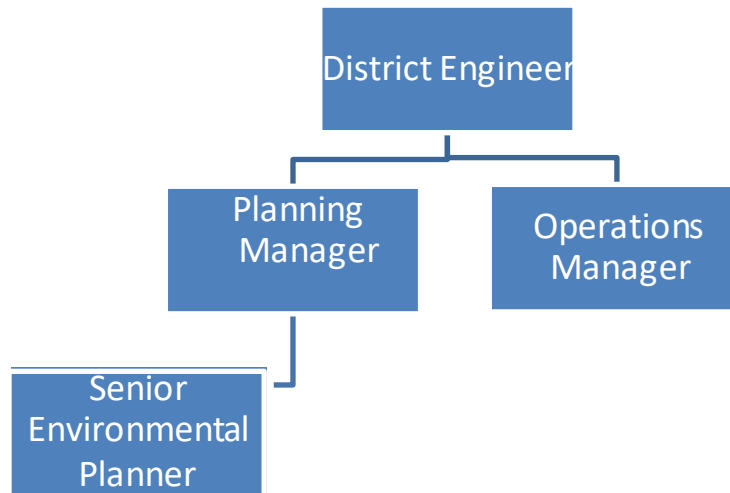
## 1. BASIC SWMP INFORMATION

This Storm Water Management Program (SWMP) Document was developed by the Idaho Transportation Department-District 1 (ITD) to meet the terms and conditions of Permit Number IDS-028223 (Municipal Separate Storm Sewer System – MS4 Permit). The Permit covers ITD's MS4 drainage area within the Kootenai County Metropolitan Urbanized Area (UA) as defined by the United States (US) census. The I-90 MS4 conveys drainage from I-90 between approximately milepost 12 and 15.

### 1.1 Staff Organization

ITD has assigned staff who are responsible for the development and implementation of the SWMP. The District Engineer has full authority to operate and delegate within the ITD. The District Engineer has delegated the authority to oversee the I-90 MS4 and associated SWMP development and implementation to the Operations Manager. The Environmental Planner assists in the development and implementation of the SWMP. The names and titles of those responsible for SWMP implementation are listed below.

An ITD organizational chart by title is shown below:



District Engineer: Damon Allen  
 Operations Manager: Ryan Hawkins  
 Planning Manager: Jerry Wilson  
 Environmental Planner: Mike Hartz

### 1.2 Receiving Waters

Fernan Creek is the receiving water for stormwater runoff from I-90 between the US-95 and Sherman Avenue interchanges in Coeur d'Alene, Idaho. Stormwater drainage from I-90 is routed to the southeast within the median storm drain between US-95 and 15<sup>th</sup> Street. Downgradient from the 15<sup>th</sup> Street interchange, stormwater flows in open ditches to Fernan Creek at approximately milepost 15.1. French gulch crosses I-90 at approximately milepost 14.55 and flows into the I-90 ditch system. Fernan Creek flows southward for approximately 0.6 miles until reaching Coeur d'Alene Lake. Interconnected stormwater flow from local City of Coeur d'Alene streets joins the I-90 drainage system at numerous points along the entire length of the I-90 MS4 segment.

Below is a list of the relevant receiving water bodies in the vicinity of the I-90 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
Fernan Creek - ID17010303PN032	Not Supporting	Temperature	Yes 50345	Unknown	1

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 4 catchments identified along with 4 assessments. The map is at [EPA's Stormwater Discharge Mapping Tools | US EPA](#).

### 1.3 SWMP Information and Statistics

The Permittee must maintain a method of gathering, tracking, and using SWMP information to set priorities, and assess Permit compliance....” Refer to Permit Part 2.5.6.

ITD maintains electronic files related to its MS4 permit on the ITD-D1 file server, including information related to I-90 MS-4 inspections and results, maintenance or corrective actions taken within a given year, relevant monitoring data, stormwater related complaints, and any applicable staff training or educational outcomes. This information is typically referenced where necessary in the I-90 MS4 annual report.

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

The Permittee must implement the required SWMP control measures of Permit IDS-028223 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.

ITD's I-90 MS4 is located within the I-90 right of way which is owned by ITD. There are currently no programmed plans to expand I-90 within the MS4 permit area although additional lanes are expected to be added to the I-90 system in the future. The 15<sup>th</sup> Street interchange is also expected to be reconstructed/reconfigured at some point in the future. If additional right of way is necessary in the future to accommodate interstate expansion, ITD would acquire additional right of way in accordance with its acquisition process. The I-90 MS4 system would be redesigned/expanded in the event of a future interstate expansion project.

## 2. MAP OF THE SEPARATE STORM SEWER SYSTEM

The I-90 MS4 in Coeur d'Alene, Idaho, discharges highway runoff from portions of I-90 from mileposts 12.0 to 15.0. The direction of flow is from west to east. The MS4 median stormwater drainage for I-90 in this segment originates in the vicinity of the US-95 interchange. The I-90 hard pipe system is positioned under the highway median and incrementally increases from 24" to 48". Numerous drop inlets are positioned in the median to receive runoff from the inside travel lanes and median area. Runoff from the outside travel lanes and shoulders typically sheet flows from the roadway surface onto vegetated right of way. The hard pipe system daylights to an open ditch in the vicinity of the 15<sup>th</sup> Street Interchange and alternates between open ditch and piped sections from that point downstream to the outfall at Fernan Creek. Several connections from the City of Coeur d'Alene's stormwater system have been made to the I-90 drainage system following construction of the interstate through this area in the 1960's. Most notably these connections occur at Government Way, 4<sup>th</sup> Street, 7<sup>th</sup> Street, 9<sup>th</sup> Street and 15<sup>th</sup> Street and others further downstream. Also, French Gulch, a small rural watershed, enters the MS4 just upstream of the Sherman Avenue interchange. Below the Sherman Avenue Interchange the MS4 discharges to a single outfall at Fernan Creek which ultimately flows to Coeur d'Alene Lake.

Maintenance of the I-90 stormwater system basically involves annual roadway brooming along with cleaning of the median drop inlets. On rare occasions, open ditches need to be excavated to maintain the original design configuration

in response to the buildup of sediment, debris and vegetation within ditches.

The figures below depict the stormwater drainage features of the I-90 storm sewer system. For a description of the MS4 permit area, refer back to section 1.2.

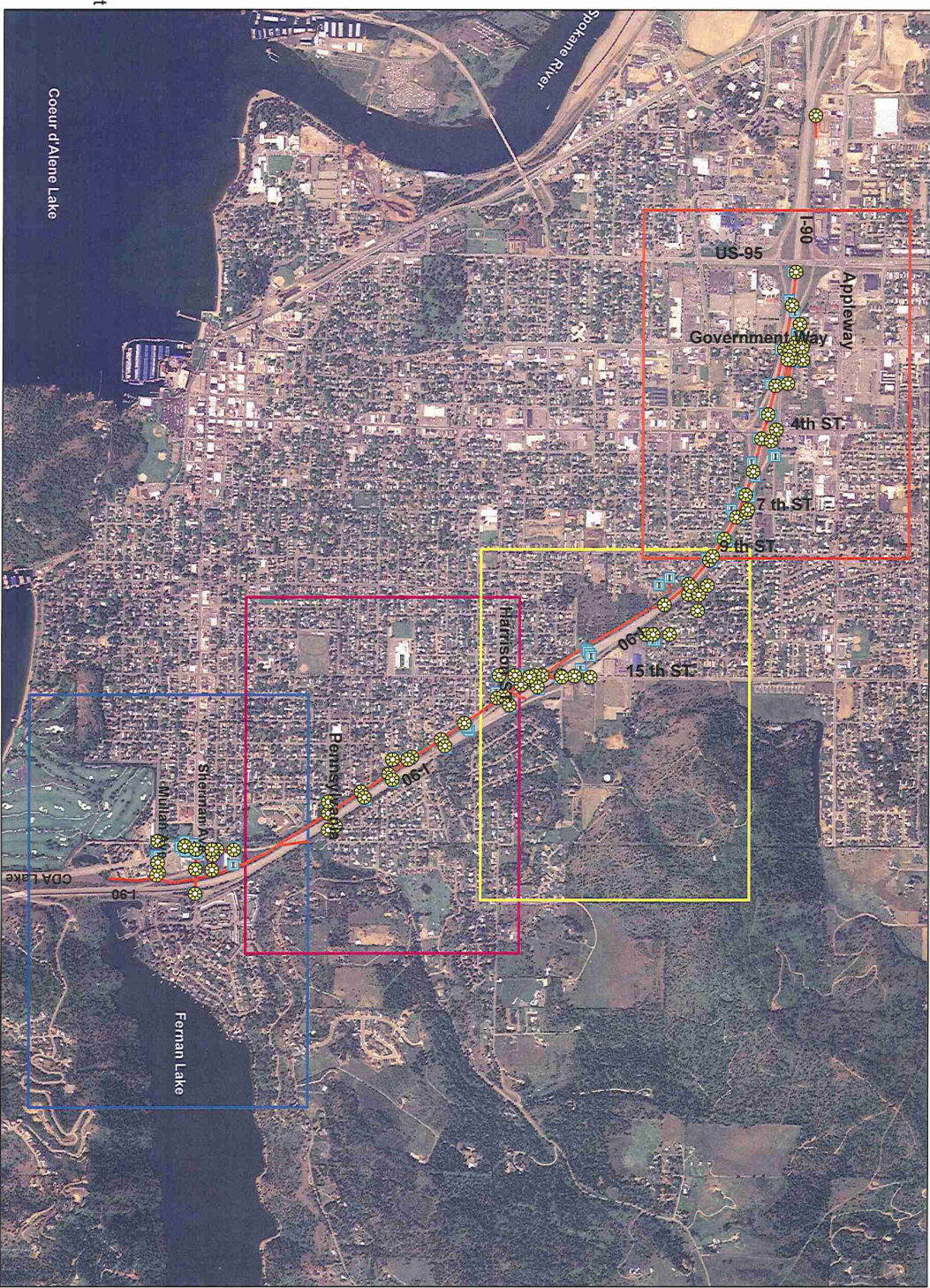


# I-90 STORMDRAIN COEUR D'ALENE, IDAHO



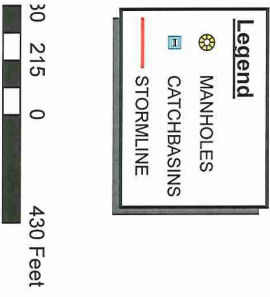
**Legend**

- MANHOLES
- CATCHBASINS
- STORMLINE
- Sheet 1
- Sheet 2
- Sheet 3
- Sheet 4





**I-90 STORMDRAIN**  
**COEUR D'ALENE, IDAHO**



**US-95 to 9th ST.**



**I-90 STORMDRAIN**  
**COEUR D'ALENE, IDAHO**



**Legend**

- MANHOLES
- CATCHBASINS
- STORMLINE



9th ST. to 15th ST.







# I-90 STORMDRAIN COEUR D'ALENE, IDAHO



## Legend

- MANHOLES
- CATCHBASINS
- STORMLINE
- French Gulch Ck



Harrison to Sherman Ave EB Exit



**I-90 STORMDRAIN**  
**COEUR D'ALENE, IDAHO**



**Legend**

- MANHOLES
- CATCHBASINS
- STORMLINE
- Fernan Creek
- Outfalls to Fernan Creek



**Sherman Ave EB Exit to CDA Drive**



### 3. TARGETING POLLUTANTS OF CONCERN

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

Per the initial permit requirements from 2008, ITD has routinely monitored the water quality of stormwater prior to discharge to Fernan Creek for temperature, total suspended solids, total phosphorus, total nitrogen, lead, zinc, hardness and flow. The receiving water, Fernan Creek, is impaired due to elevated temperature in this lake outlet stream. ITD proposes to discontinue future water quality monitoring.

#### 3.2. Pollutant Reduction Activities

No pollutant reduction activities have been identified to address temperature impairment in Fernan Creek. Typically, the I-90 MS4 does not discharge stormwater during periods of elevated summer water temperatures.

### 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...” 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>	Standard Specifications for Highway Construction Section 107.17.
<b>6. To carry out all inspection, surveillance, and monitoring procedures necessary to determine compliance and noncompliance with the Permit.</b>	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.

## 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  
[Chapter 1 Erosion Control Best Management Practices.pdf](#)

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 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 to 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 projects 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. The necessary 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 the 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>.



## 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 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 are 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 to 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 is 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 are 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 the 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 licensures 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 1 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.

#### **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 are 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 I-90. There are no private parcels that have direct access to or connect with the interstate. 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 I-90 is 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.



## 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 the 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 to 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 flow 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 flow into surface water, and appropriate actions to prevent adverse impacts.
- Define MS4 and ITD's roles and responsibilities.

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, 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 suit 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.

## **5.6 Inventory and Management of Street / Road Maintenance Materials**

ITD stores winter maintenance materials typically salt or treated salt, in a covered shed, on its 40-acre maintenance yard on the northeast corner of Ramsey Road and Marie Avenue Street, Road, Highway, and Parking Lot Sweeping

ITD has a Cooperative Agreement with the City of Coeur d'Alene for the maintenance of US-95. The city performs street sweeping and gutter clean-out on the portion of US-95 between I-90 and Northwest Boulevard. ITD maintains the operational condition of I-90.

## **6. UNIQUE PROVISIONS**

### **6.1 Annual Compliance Evaluation**

Vacant

### **6.2 Alternative Control Measure Requests**

Vacant

### **6.3 Adaptive Management Actions**

Vacant