

Permit Appendix B.2 MS4 Permit Annual Report Form



This Annual Report is due no later than December 1 of each year, beginning in Calendar Year 2020, and reflects the relevant reporting period, beginning in 2019. See Permit Part 6.4.2

Annual Reports and any attachments must be sent to EPA and IDEQ by U.S. Postal Mail to the following addresses:

U.S. EPA, Region 10
Enforcement and Compliance Assurance Division
Attn: Surface Water Enforcement Section
1200 6th Avenue, Suite 155 - Mail Code 20-C04
Seattle, Washington 98101-3188

Regional Administrator, Pocatello Regional Office
Idaho Department of Environmental Quality
Attn: Water Quality Program
444 Hospital Way, #300
Pocatello, ID 83201

Complete Sections 1 through IV. Do not leave any questions blank.

MS4 Permittees Names/Organizations:

Pocatello Urbanized Area/City of Pocatello; City of Chubbuck; Bannock County; Idaho Transportation Department, District 5; Idaho State University

NPDES Permit Number:

IDS028053

Indicate Annual Report Number & Reporting Period:

- ☒ **Year 1 Reporting Period:** Oct. 1, 2019 – Sept. 30, 2020 – **Annual Report Due Date:** Dec. 1, 2020
- ☐ **Year 2 Reporting Period:** Oct. 1, 2020 – Sept. 30, 2021 – **Annual Report Due Date:** Dec. 1, 2021
- ☐ **Year 3 Reporting Period:** Oct. 1, 2021 – Sept. 30, 2022 – **Annual Report Due Date:** Dec. 1, 2022
- ☐ **Year 4 Reporting Period:** Oct. 1, 2022 – Sept. 30, 2023 – **Annual Report Due Date:** Dec. 1, 2023
- ☐ **Year 5 Reporting Period:** Oct. 1, 2023 – Sept. 30, 2024 – **Annual Report Due Date:** Sept. 30, 2024
- ☐ Other

Certification: "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I have no personal knowledge that the information submitted is other than true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Signature:

Printed Name:

Brian C. Blad

Title/Organization:

Mayor/ City of Pocatello

Date:

November 13, 2020

APPROVED BY LEGAL

Date

11/24/20

Permit Appendix B.2 - MS4 Annual Report Form

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Comments

Section I. General Information

MS4 Facility Site Name:

MS4 Facility Organization Formal Name:

MS4 Facility Contact Name:

Title:

MS4 Contact Telephone:

MS4 Contact Email Address:

MS4 Facility Contact Type (all that apply): Owner Operator Main Contact

MS4 Facility Site Address:

MS4 Facility Site City, State, Zip Code:

MS4 Facility Site Mailing Address: *if different from above*

Is the MS4 Facility Site Located On Tribal Land? Yes No

MS4 Facility Jurisdiction Type (check all that apply - for all permittees):

Federal	County
State	City or Town
College or University	Highway District
State Highway Department	Tribal
Municipal:	Other _____

List All Receiving Water(s) For the MS4 Discharges (from all permittees):

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Signature:

Printed Name:

Rodney Burch

Title/Organization:

Public Works Director/ City of Chubbuck

Date:

11/19/2020

Section I. General Information

MS4 Facility Site Name:

MS4 Facility Organization Formal Name:

MS4 Facility Contact Name:

Title:

MS4 Contact Telephone:

MS4 Contact Email Address:

MS4 Facility Contact Type (all that apply): Owner Operator Main Contact

MS4 Facility Site Address:

MS4 Facility Site City, State, Zip Code:

MS4 Facility Site Mailing Address: *if different from above*

Is the MS4 Facility Site Located On Tribal Land? Yes No

MS4 Facility Jurisdiction Type (check all that apply - for all permittees):

Federal	County
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Signature:

A handwritten signature in blue ink, which appears to read "Ernie Moser", is written over a horizontal line.

Printed Name:

Ernie Moser

Title/Organization:

Chairman/ Bannock County Board of Commissioners

Date:

November 10, 2020

Section I. General Information

MS4 Facility Site Name:

MS4 Facility Organization Formal Name:

MS4 Facility Contact Name:

Title:

MS4 Contact Telephone:

MS4 Contact Email Address:

MS4 Facility Contact Type (all that apply): Owner Operator Main Contact

MS4 Facility Site Address:

MS4 Facility Site City, State, Zip Code:

MS4 Facility Site Mailing Address: *if different from above*

Is the MS4 Facility Site Located On Tribal Land? Yes No

MS4 Facility Jurisdiction Type (check all that apply - for all permittees):

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Signature:

DocuSigned by:

Glen Nelson

5F51E7C3B6BB4AF...

Printed Name:

Dr. Glen Nelson

Title/Organization:

VP Finance & Business Affairs/ Idaho State University

Date:

11/9/2020

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MS4 Facility Contact Name:

Title:

MS4 Contact Telephone:

MS4 Contact Email Address:

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Signature: 

Printed Name:

Todd Hubbard

Title/Organization:

District Engineer/Idaho Transportation Department, District 5

Date:

11/9/2020

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Title:

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Section II. Permittee Responsibility:

Please answer all questions. If the answer is "No," or "Not Applicable" and no other direction is provided, use the Comments field at the end of this section to explain the reason and the expected date(s) that the requirement will be met, and/or to explain why the requirement does not apply.

1. The Permittees share implementation responsibility for Permit compliance with each other.

Yes

No

Not Applicable

Is the agreement between the Permittees described/cited in the Stormwater Management Program (SWMP) Document?

Yes

No

Not Applicable

2. The Permittees share implementation responsibility for Permit compliance with one or more outside (non-Permittee) entities.

Is the agreement with these other entity(ies) described/cited in the SWMP Document?

Yes

No

Not Applicable

3. The Permittees maintain relevant ordinances or other regulatory mechanisms to control pollutant discharges into and from the MS4 to meet the requirements of this GP.

Yes

No

Not Applicable

(If "No," use the Comment field to specify on overall progress to adopt adequate ordinances or utilizing available regulatory mechanisms.)

4. The Permittees SWMP Document is posted on a publicly accessible website.

Yes

Identify the URL for the webpage where the SWMP Document can be accessed:

http://_____

No

Not Applicable

5. (Year 3 Annual Report only): The Permittees SWMP Document been updated to describe the implementation of the selected Monitoring/Assessment and/or Pollutant Reduction activities cited in Permit Part 4.

Yes

Identify the webpage address where the SWMP Document can be accessed:

http://_____

No

Not Applicable

6. Each Permittee regularly tracks certain activities to set priorities and assess compliance with the Permit requirements.

Yes

No

Not Applicable

7. During the reporting period, responsibility for SMWP implementation has changed due to a Transfer of Ownership or Operational Authority over a geographic portion of the MS4.

The Permittees' SWMP Document has been updated to reflect these changes in responsibility for any new or transferred areas served by the MS4.

Yes

If yes, use the Comments field to provide a brief statement summarizing the change in ownership or operational authority.

No

Not Applicable

Section II Comments:

Section III. Status of SWMP Control Measures

Please answer all questions for each SWMP control measure and associated component activity. In the Comments field, cite any relevant information and/or statistics that helps illustrate the Permittee's implementation of the required action/activity.

If the answer is "No," use the Comments field to explain the reason, and outline the expected dates that the requirement will be met.

If the requirement does not apply to the Permittee's organization, mark "NA" and explain why it does not apply in the Comments field.

Public Education, Outreach and Involvement Program (Permit Part 3.1)

- 8. The Permittees conduct an education, outreach, and public involvement program based on stormwater issues of significance in the Permittees' jurisdiction.**

Yes, this organization conducts the education, outreach, and involvement activities required by the Permit

Yes, this organization works through contract with other entities to conduct the education, outreach, and involvement activities required by the Permit

No

Not Applicable

- 9. Target Audience: During the reporting period, the Permittees focused their education, outreach, and public involvement messages to the following audience(s):**

General Public (including homeowners, homeowner's associations, landscapers, and property managers)

Business/Industrial/Commercial/Institutions (including home based and mobile businesses)

Construction/Development (e.g., Engineers, Contractors, Developers, Landscape Architects, Site Design Professionals)

Elected Officials, Land Use Policy and Planning Staff

Other (describe in Comments section below)

- 10. Topics: During the reporting period, this Permittees focused their education, outreach, and public involvement messages on the following topics (select all that apply):**

General impacts of stormwater flows into surface water, and appropriate actions to prevent adverse impacts;

Impacts from impervious surfaces, techniques to avoid adverse impacts;

Yard care techniques protective of water quality, such as composting;

Proper use, application & storage of pesticides, herbicides, and fertilizers;

Litter & trash control and recycling programs;

BMPs for power washing, carpet cleaning, auto repair & maintenance;

Low Impact Development/green infrastructure techniques, including site design, pervious paving, retention of mature trees/vegetation, landscaping and vegetative buffers;

Maintenance of landscape features providing water quality benefits;

Stormwater treatment and volume control practices;

Technical standards for stormwater site plans; including appropriate selection, installation, and use of required construction site control measures

Source control BMPs and environmental stewardship;

Impacts of illicit discharges and how to report them;

Actions and opportunities for pet waste control/disposal,

Water wise landscaping, water conservation, water efficiency

BMPs for use and storage of automotive chemicals, hazardous cleaning supplies, vehicle wash soaps and other hazardous materials;

11. During the reporting period, the Permittees began and/or continued distribution of the selected messages/activities to the intended target audience.

Yes

Please summarize the message/activity conducted during the reporting period in the Comments section below.

No

*Note: Permit Part 3.1.3 requires Permittees to conduct at least eight (8) educational messages or activities no later than **September 30, 2024**.*

Not Applicable

12. During this reporting period, the Permittees assessed, or participated in efforts to assess, the understanding and adoption of intended behaviors by the target audience.

Yes; In the Comments section below, please summarize efforts to assess the selected education, outreach and public involvement activities conducted during the reporting period. If information is available, describe how this information is used to improve the education/outreach efforts.

No

Not Applicable

13. During this reporting period, the Permittees offered (or worked with others to offer) training/education regarding construction site runoff control measures to site operators working in the Permittees' jurisdiction.

Yes

No

*Note: Permit Part 3.1.7.1 requires Permittees to offer outreach/training on construction site control measures at least twice during the permit term, no later than **September 30, 2024**.*

Not Applicable

14. During this reporting period, the Permittees offered (or worked with others to offer) training/education regarding permanent stormwater controls to audiences working in the Permittees' jurisdiction.

Yes

No

*Note: Permit Part 3.1.7.2 requires Permittees to offer outreach/training on permanent stormwater controls at least twice during the permit term, no later than **September 30, 2024**.*

Not Applicable

15. The Permittees maintain and promote a publicly-accessible website that provides current SWMP-related information cited in Permit Part 3.1.8. This website was recently updated prior to submitting this Report.

Yes

URL for the Permittee's webpage:

*http://*_____

No

Not Applicable

Comments on Public Education, Outreach, and Involvement Program:

Use this Comments field to explain or discuss unique implementation schedules, summarize nature of the education, outreach, and public involvement activities conducted during the reporting period

Illicit Discharge Detection and Elimination Program (Permit Part 3.2)

- 16. To the extent allowable pursuant to authority granted under Idaho law, each Permittee conducts and enforces a program to detect and eliminate illicit discharges into the MS4.**

Yes

No

*Note: Permit Part 3.2 requires Permittees to revise and update their existing programs as necessary to comply with Permit Parts 3.2.2 through 3.2.9 no later than **April 3, 2024**.*

Not Applicable

- 17. The Permittees maintain a current MS4 Map and Outfall Inventory as described in Permit Part 3.2.2.**

Yes

No

*Note: Permit Part 3.2 requires Permittees to update their Map(s) and Inventory no later than **April 3, 2024**.*

Not Applicable

- 18. To the extent allowable pursuant to authority granted under Idaho law, the each Permittee prohibits non-storm water discharges into the MS4 (except those identified in Permit Part 2.4) through an ordinance or other regulatory mechanism.**

Yes – if yes, please provide citation/web address to the ordinance/regulatory mechanism:

No

*Note: Permit Part 3.2 requires Permittees to revise and update their existing programs as necessary no later than **April 3, 2024**.*

Not Applicable

- 19. The Permittees maintain a dedicated telephone number, email address, and/or other means for the public to report illicit discharges,**

Yes – if yes, please provide phone number/web address:

No

*Note: Permit Part 3.2 requires Permittees to revise and update their existing programs as necessary no later than **April 3, 2024**.*

Not Applicable

20. Each Permittee organization responds and investigates illicit discharge complaints or reports within two working days.

Yes

No

*Note: Permit Part 3.2 requires Permittees to revise and update their existing programs as necessary no later than **April 3, 2024**.*

Not Applicable

21. Number of Public Complaints/Reports Received During this Reporting Period:

22. Number of Illicit Discharge Complaints/Reports Investigated through field visits, sampling or other follow-up action_____

23. Number of Illicit Discharge Complaints/Reports Resolved_____

24. The Permittees conduct a dry weather analytical and field screening monitoring program to identify non-stormwater flows from MS4 outfalls.

Yes

No

Not Applicable

25. During the reporting period, the Permittees used their written protocols to prioritize and identify MS4 outfalls for dry weather discharge investigation.

Yes

No

Not Applicable

26. Total Number of MS4 Outfalls in the Permittees' jurisdiction of the Permit Area:

27. During the reporting period, the permittees completed visual dry weather screening on at least 50 MS4 outfalls.

Yes

No – Total # of outfalls screened in this jurisdiction was less than 50

Not Applicable

28. Of the 50 outfalls screened during the reporting period:

How many outfalls were discharging during dry weather? _____

How many of these identified dry weather discharges were sampled or otherwise investigated to determine the discharge source? _____

How many of the identified dry weather discharges resulted in the Permittee action to address and eliminate the discharge source? _____

29. During this reporting period, how many of the Permittees' MS4 outfalls have been identified as having dry weather flows caused by irrigation return flow or ground water seepage?

Number of outfalls identified this reporting period _____

Total number of MS4 outfalls identified to date, as having dry weather flows from irrigation or groundwater seepage _____

*Note: Permit Part 3.2.6 requires Permittees to provide a complete list of MS4 outfalls locations identified as having dry weather flows caused by irrigation return flow or ground water seepage as part of the Permit Renewal Application no later than **April 3, 2024**.*

30. The permittees maintain written spill response procedures and coordinates appropriate spill prevention, containment and response activities with other organizations in the Permit Area to ensure maximum water quality protection at all times.

Yes

No

Not Applicable

31. Each Permittees organization coordinates with appropriate local entities to educate employees and the public of the proper management and disposal or recycling of used oil, vehicle fluids, toxic materials, and other household hazardous wastes.

Yes

No

Not Applicable

32. Each Permittee's staff responsible for investigating, identifying and eliminating illicit discharges, spills, and illicit connections into the MS4 are trained to conduct such activities

Yes

No

Not Applicable

Comments on Illicit Discharge Detection and Elimination Program:

Use this Comments field to explain any unique implementation schedules, highlight investigation results or follow-up actions, discuss subsequent enforcement actions, etc. that were conducted during the relevant reporting period.

Construction Site Runoff Control Program (Permit Part 3.3)

- 33. Each Permittee uses an ordinance or other regulatory mechanism to require erosion, sediment, and waste material management controls at construction project site activity that results in land disturbance of one (1) or more acres and discharges to the MS4.**

Yes

No

*Note: Permit Part 3.3 requires Permittees to update their construction site runoff control requirements no later than **April 3, 2024**.*

Not Applicable

- 34. Each Permittee organization requires construction site operators to submit construction site plans for projects disturbing one (1) or more acres for Permittee review.**

Yes

No

*Note: Permit Part 3.3 requires Permittees to update their construction site runoff control requirements no later than **April 3, 2024**.*

Not Applicable

- 35. Each Permittee organization inspects construction sites that disturb one (1) or more acres to ensure compliance with applicable requirements for erosion, sediment and waste material management controls.**

Yes

No

*Note: Permit Part 3.3 requires Permittees to update their construction site runoff control requirements no later than **April 3, 2024**.*

Not Applicable

- 36. Each Permittee organization inspects construction sites using an inspection prioritization system.**

Yes

No

*Note: Permit Part 3.3 requires Permittees to update their construction site runoff control requirements no later than **April 3, 2024**.*

Not Applicable

- 37. Each Permittee organization implements a written escalating enforcement response policy or plan (ERP) for construction site runoff control.**

Yes

No

*Note: Permit Part 3.3 requires Permittees to update their construction site runoff control requirements no later than **April 3, 2024**.*

Not Applicable

- 38. Each Permittee organization ensures that all persons responsible for preconstruction site plan review, site inspections, and enforcement of construction site runoff control requirements are appropriately trained to conduct such activities – specifically, this organization provides orientation and training for new staff working on construction runoff control issues within the first six (6) months of employment.**

Yes

No

*Note: Permit Part 3.3 requires Permittees to update their construction site runoff control requirements no later than **April 3, 2024**.*

Not Applicable

Comments on Construction Site Runoff Control:

Use this Comments field to explain unique implementation schedules, summarize the number of site inspections, follow-up actions, and/or any subsequent enforcement actions, etc that were conducted during the relevant reporting period.

Post Construction Stormwater Management in New Development & Redevelopment
(Permit Part 3.4)

39. Through ordinance or other regulatory mechanism, each Permittee organization requires the installation and long-term maintenance of permanent stormwater controls at new development and redevelopment project sites that result from land disturbance greater than or equal to 1 acre and that discharges to the MS4.

The required stormwater controls must be sufficient to retain onsite the runoff volume produced from a 24-hour 95th percentile storm event, and/or require runoff treatment sufficient to attain an equal or greater level of water quality benefit as this onsite retention standard.

Yes

Please cite to the ordinance containing the permanent stormwater control requirements:

No

*Note: Permit Part 3.4 requires Permittees to update their permanent stormwater control requirements no later than **April 3, 2024**.*

Not Applicable

40. Each Permittee organization requires permanent storm water controls through written specifications.

Yes

Please cite to the document containing the permanent stormwater control requirements:

No

*Note: Permit Part 3.4 requires Permittees to update their permanent stormwater control requirements no later than **April 3, 2024**.*

Not Applicable

41. Each Permittee organization requires preconstruction site plan review and approval for permanent storm water controls at new development and redevelopment sites that result in land disturbance of one or more acres and discharge to the MS4.

Yes

No

*Note: Permit Part 3.4 requires Permittees to update their permanent stormwater control requirements no later than **April 3, 2024**.*

Not Applicable

- 42. Each Permittee organization has identified high priority locations in the jurisdiction where the Permittee regularly inspects the installation, and long-term operation, of permanent stormwater controls.**

Yes

No

*Note: Permit Part 3.4 requires Permittees to update their permanent stormwater control requirements no later than **April 3, 2024**.*

Not Applicable

- 43. Each Permittee organization has an enforcement strategy to ensure and maintain the functional integrity of permanent stormwater controls within this jurisdiction.**

Yes

No

*Note: Permit Part 3.4 requires Permittees to update their permanent stormwater control requirements no later than **April 3, 2024**.*

Not Applicable

- 44. Each Permittee organization uses a database inventory to track and manage the operational condition of permanent stormwater controls within this jurisdiction.**

Yes

No

*Note: Permit Part 3.4 requires Permittees to update their permanent stormwater control requirements no later than **April 3, 2024**.*

Not Applicable

- 45. Each Permittee organization requires enforceable and transferable O&M Agreements, where parties other than this Permittee organization are responsible for operation and maintenance of permanent storm water controls?**

Yes

*No - Note: Permit Part 3.4 requires Permittees to update their permanent stormwater control requirements no later than **April 3, 2024**.*

Not Applicable

- 46. Each Permittee organization ensures that all persons responsible for reviewing site plans for permanent stormwater controls and/or for inspecting the installation and operation of permanent controls are trained to conduct such activities**

Yes

*No - Note: Permit Part 3.4 requires Permittees to update their permanent stormwater control requirements no later than **April 3, 2024**.*

Not Applicable

Comments on Post Construction Stormwater Management in New Development and Redevelopment

Use this Comments field as necessary to explain any unique implementation schedules, summarize inspections, actions, etc. that were conducted during the relevant reporting period.

Pollution Prevention/Good Housekeeping for MS4 Operations (Permit Part 3.5)

- 47. Each Permittee organization inspects all MS4 catch basins and inlets in the jurisdiction at least once every five years and takes appropriate maintenance or cleaning action based on those inspections.**

Yes

No – Permittee uses an alternate inspection & maintenance schedule as outlined in the SWMP Document.

No

*Note: Permit Part 3.5 requires Permittees to update their pollution prevention and good housekeeping as needed to properly operate and maintain their MS4s no later than **April 3, 2024**.*

Not Applicable

Total Number of catch basins and inlets inspected this reporting period _____

- 48. Each Permittee organization operates and maintains Streets, Roads, Highways and/or Parking Lots in its jurisdiction in a manner that protects water quality and reduces the discharge of pollutants through the MS4.**

Yes

No

*Note: Permit Part 3.5 requires Permittees to update their requirements pollution prevention/good housekeeping for MS4 Operations no later than **April 3, 2024**.*

Not Applicable

- 49. Each Permittee organization operates all street/road maintenance material storage locations in a manner that prevents pollutants in stormwater runoff from discharging to the MS4 or into any receiving waterbody. A description of each Material Storage Location is included in the SWMP Document, as required by Permit Part 3.5.4**

Yes

No

*Note: Permit Part 3.5 requires Permittees to update their requirements pollution prevention/good housekeeping for MS4 Operations no later than **April 3, 2024**.*

Not Applicable

- 50. Each Permittee organization sweeps all areas of the jurisdiction that discharge to the MS4 at least once annually. A description of the street sweeping program, as required by Permit Part 3.5.5, is included in the SWMP Document.**

Yes

No

*Note: Permit Part 3.5 requires Permittees to update their requirements pollution prevention/good housekeeping for MS4 Operations no later than **April 3, 2024**.*

Not Applicable

- 51. Each Permittee organization has reviewed its operation and maintenance activities for the types of activities listed below and confirms that all such activities are conducted in a manner that protects water quality and reduces the discharge of pollutants through the MS4.** Municipal Activities to be addressed include: *grounds/park and open space maintenance operations; fleet maintenance and vehicle washing operations; building maintenance; snow disposal site operation and maintenance; solid waste transfer activities; municipal golf course maintenance; materials storage; hazardous materials storage; used oil recycling; and spill control and prevention measures for municipal refueling facilities.*

Yes

No

*Note: Permit Part 3.5 requires Permittees to update their requirements pollution prevention/good housekeeping for MS4 Operations no later than **April 3, 2024**.*

Not Applicable

- 52. Each Permittee organization ensures appropriate practices to reduce the discharge of pollutants to the MS4 associated with the application, storage and disposal of pesticides, herbicides and fertilizers. All employees or contractors applying pesticides, etc. are instructed to follow all label requirements, including those regarding application methods, rates, number of applications allowed, and disposal of the pesticide/herbicide/fertilizer and rinsate.**

Yes

No

*Note: Permit Part 3.5 requires Permittees to update their requirements pollution prevention/good housekeeping for MS4 Operations no later than **April 3, 2024**.*

Not Applicable

- 53. Each Permittee organization uses site specific Storm Water Pollution Prevention Plans for all Permittee-owned material storage facilities, heavy equipment storage areas, and maintenance yards located in the Permit Area.**

Yes

No

*Note: Permit Part 3.5 requires Permittees to update their requirements pollution prevention/good housekeeping for MS4 Operations no later than **April 3, 2024**.*

Not Applicable

- 54. Each Permittee organization ensures that all persons responsible for municipal operations and maintenance activities are trained to conduct such activities**

Yes

No

*Note: Permit Part 3.5 requires Permittees to update their requirements pollution prevention/good housekeeping for MS4 Operations no later than **April 3, 2024**.*

Not Applicable

Comments on Pollution Prevention/Good Housekeeping for MS4 Operations

Use this Comments field as necessary to explain any unique implementation schedules, summarize inspections, actions, etc. that were conducted during the relevant reporting period

Section IV. SPECIAL CONDITIONS FOR DISCHARGES TO IMPAIRED WATERS

Provide a current status report regarding the development of any required Monitoring/Assessment Plan and implementation of pollutant reduction activities as required by Permit Part 4.

55. *Permit Part 4 - Narrative Status Report:*

Section V. Response To Excursions Above Idaho Water Quality Standards

- 56. During this or any prior reporting period, did the Permittees submit written notification to EPA and IDEQ regarding MS4 discharge that are causing or contributing to an excursion above the WQS as directed by Permit Part 5.1?**

Yes – if yes, proceed to Q.56

No

Not Applicable

- 57. During this or any prior reporting period, did the Permittees submit an Adaptive Management Report to EPA and IDEQ, as directed by Permit Part 5.2?**

Yes – if yes, proceed to Q.57

No

Not Applicable

- 58. Provide a summary of the Permittees' efforts to date that address the MS4 discharges contributing to the original water quality excursion, including the results of any monitoring, assessment, or evaluation efforts conducted during the reporting period.**

59. List any attachments submitted as part of this Annual Report:

Portneuf Valley Stormwater Management Program (SWMP)

For City of Pocatello, City of Chubbuck, Bannock County, Idaho Transportation Department District 5, and Idaho State University

MS4 NPDES Permit #IDS028053

Contact:

Pocatello Urbanized Area Stormwater Permit
c/o Hannah Sanger
City of Pocatello
PO Box 4169
Pocatello, ID 83205
<https://stormwater.pocatello.us>

November 2020



**Idaho State
University**

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Acronyms

BMP	Best Management Practice
CGP	Construction General Permit
CWA	Clean Water Act
EHS	Environmental Health and Safety Department, ISU
EPA	Environmental Protection Agency
ERP	Escalating Response Plan
ESC	Erosion and Sediment Control
HHW	Household Hazardous Waste
HQ	Headquarters
IDEQ	Idaho Department of Environmental Quality
ISU	Idaho State University
ITD	Idaho Transportation Department, District 5
MEP	Maximum Extent Practicable
MS4	Municipal Separate Storm Sewer System
MSGP	Multi Sector General Permit
NPDES	National Pollutant Discharge Elimination System
O&M	Operations and Maintenance
PUA	Pocatello Urbanized Area
SWMP	Stormwater Management Program
QAPP	Quality Assurance Project Plan
TMDL	Total Maximum Daily Load
TSS	Total Suspended Sediment
USACE	United States Army Corps of Engineers
WOTUS	Waters of the United States
WQS	Water Quality Standard

A. BASIC SWMP INFORMATION (Permit Part 1 and 2)

This Stormwater Management Program (SWMP) Document was developed by the Pocatello Urbanized Area (PUA) Permittees to describe the activities and control measures conducted to meet the terms and conditions of NPDES Permit # IDS028053. This SWMP and referenced links are posted at:

- **Documents** – <https://www.pocatello.us/443/Storm-Water-Permit>
- **Map** – <https://pocatello.maps.arcgis.com/apps/webappviewer/index.html?id=fa9b44d8278049f2a67ad286f7baec59>

Permit Part 1.1 Permit Area

Land Use and Topography

This Municipal Separate Storm Sewer System (MS4) is owned and operated by the following permittees – City of Pocatello, City of Chubbuck, Bannock County, Idaho Transportation Department (District 5), & Idaho State University. The population of the combined permittee's MS4 is over 72,000 people, with 75% of the population residing in Pocatello. The MS4's primary land-use is residential and commercial, with isolated industrial areas, as well as some undeveloped recreational lands and agricultural fields. Undeveloped land is primarily characterized as sagebrush-steppe.

The MS4 permit area covers an area of ~16,000 acres in the Portneuf Valley, at the base of the Portneuf River watershed. It extends from predominantly loess soil hillsides to the valley floor, which slopes gently northwest, having few topographic features, other than lava basalt outcrops and exposed gravel pits of Bonneville flood deposits (c.14,500 years ago). Adjoining the Portneuf Valley (elevation 1350m) and the MS4, the Bannock and Portneuf Mountain Ranges reach 2100m and 2800m, respectively, providing stream and aquifer recharge to a valley with an annual average of 12.13" of precipitation and 44" of snowfall (per US Climate Data).

Waterbodies

The MS4 permit area covers an area of ~16,000 acres in the Portneuf Valley, at the base of the Portneuf River watershed. It extends from predominantly loess soil hillsides to the valley floor, which slopes gently northwest, having few topographic features other than lava basalt outcrops and exposed gravel pits of Bonneville flood deposits (c.14,500 years ago). Adjoining the Portneuf Valley (elevation 1350m) and the MS4, the Bannock and Portneuf Mountain Ranges reach 2100m and 2800m, respectively, providing stream and aquifer recharge to a valley with an annual average of 12.13" of precipitation and 44" of snowfall (per US Climate Data).

From these mountain ranges, a handful of perennial and intermittent streams flow through the MS4. As noted below, many of these streams have been classified as impaired. As a result, a TMDL (Portneuf River TMDL Revision and Addendum, 2010) has been developed for these water bodies to address impairments to beneficial uses (cold water aquatic life & recreation). The MS4 primarily impacts the Portneuf River and Pocatello Creek:

- The Portneuf River originates in the high-country lands of the Shoshone-Bannock Tribes and flows for about 90 miles through primarily agricultural lands before entering the MS4 along its southeastern boundary. From the MS4 it flows northwest and back onto tribal land before entering the Snake River at American Falls Reservoir. In Pocatello, the

PORTNEUF VALLEY STORMWATER MANAGEMENT PROGRAM

Portneuf River is contained in an Army Corps of Engineers flood control structure for most of its course (i.e. levees for over 4 miles and concrete channel for 1.6 miles). The TMDL addresses the following impairments for this reach of the Portneuf: sediment/siltation, nitrogen, phosphorous, bacteria, and oil & grease. Agricultural practices upstream of the MS4 significantly reduce summer flow through the MS4 (through irrigation diversions) and contribute high levels of sediment and nutrients to the Portneuf River prior to entering the MS4.

- Pocatello Creek originates in the Pocatello range to the east of the MS4 and flows from east to west, ultimately joining the Portneuf River in the northwest section of the MS4. Within the MS4, Pocatello Creek is generally piped or within manmade ditches. In the piped section, stormwater catch basins are directly on top of Pocatello Creek, which is under a city street. Summer flow is significantly increased by Hilene Canal irrigation return flow inputs. The Portneuf River TMDL addresses sedimentation/siltation in Pocatello Creek.

Additionally, the Portneuf River TMDL addresses total nitrogen, total phosphorous, and sedimentation/siltation for all unnamed 2nd order streams. Below is a full list of all the perennial streams within the MS4, including their water quality status from IDEQ's 2016 Integrated Report and the number of outfalls that discharge to each stream. All irrigation canals that receive stormwater discharge have also been included.

Receiving Waterbody Segments	Water Quality Status Classification ¹	Impairment(s) of Concern	Discharging Outfalls (#)
Portneuf River Marsh Creek to American Falls Res. ID17040208SK001_05	Not supporting	Total Nitrogen, Oil & Grease, Total Phos., Dissolved Oxygen, <i>E. coli</i> , Temp, TSS, Physical substrate habitat alterations	144
Pocatello Creek South Fork to mouth. ID17040208SK024_03 ID17040208SK024_03a	Not supporting Not supporting	Sedimentation/siltation Sedimentation/siltation	65
City Creek ID17040208SK002_02	Not supporting	<i>E. coli</i>	0
Cusick Creek ID17040208SK001_02a	Fully supporting	N/A	0
Cedar Lake/Buck Creek	Not Assessed	N/A	1
Johnny Creek ID17040208SK001_02	Not supporting	Total Nitrogen, Total Phosphorous, Sedimentation/siltation, Oil & Grease	4
Gibson Jack Creek ID17040208SK003_02 ID17040208SK003_02a	Not supporting Fully supporting	Sedimentation/siltation N/A	0
Hilene Canal	Not Assessed	N/A	7
Tyhee Wasteway Canal	Not Assessed	N/A	6

¹ Water Quality Status based on 2016 Integrated Report

Stormwater Asset Summary

Each permittee owns and maintains a number of stormwater assets within the MS4 and in adjacent areas that do not drain to the MS4 or Waters of the US (WOTUS). Within the MS4, the City of Pocatello has the largest number of stormwater assets, including piped conveyances and numerous detention ponds. The City of Chubbuck has a significant number of dry wells for capturing and infiltrating stormwater, most of which are outside of the MS4. Within the MS4, Chubbuck has a small piped conveyance system, Bannock County has a system of culverts crossing county roads, ITD also owns and maintains numerous culverts crossing Interstate 15, Interstate 86 and Highway 30 in the MS4, and ISU has a small system of piped conveyances and detention ponds.

MS4 Boundary

The MS4 boundary is based on the extent of the permittees' MS4 system within the Pocatello Urbanized Area. Lands which do not drain to the MS4 or WOTUS have been excluded from the MS4 map. Excluded areas are primarily north of I-86, and close to the I-15/5th Street interchange. Stormwater in these areas infiltrates into the ground with no MS4/WOTUS connection.

Permit Part 2.5 Permittee Responsibilities

Shared Implementation

There are five permittees responsible for implementation of the PUA's MS4 permit. The permit provides for co-permittees to jointly meet permit obligations, using an intergovernmental agreement that describes each organization's respective roles and responsibilities. The permittees have updated the existing intergovernmental agreement to identify three shared responsibilities (monitoring, administration, and public education) and individual agency cost share support for each of these obligations. The agreement also provides a mechanism for joint funding of other permit activities (e.g. watershed planning) that may occur during the term of the permit.

The updated 2020 Intergovernmental Agreement (available at – <https://www.pocatello.us/443/Storm-Water-Permit>) identifies the City of Pocatello as the lead for administration and monitoring requirements, as well as the lead for public involvement, outreach, and education.

Annual Report Permittee Responsibility

The Permittees share implementation responsibility for Permit compliance with one or more Permittees. **Y/N**

This Permittee organization shares implementation responsibility for Permit compliance with one or more outside (non-Permittee) entities. **Y/N**

Individual Permittee Implementation

Contact information is listed below for key personnel responsible for establishing and maintaining compliance with the conditions of the Phase II Permit for each permittee's compliance activities.

City of Pocatello

- Hannah Sanger, Environmental Administrator; (208) 234-6518, hsanger@pocatello.us
- Jenna Dohman, Environmental Technician; (208) 234-6519, jdohman@pocatello.us
PO Box 4169, Pocatello ID 83205/ 911 N 7th Ave, Pocatello ID 83201

Bannock County

- Michael R. Jaglowski, PE, CFM, County Engineer; (208) 236-7230, mjaglowski@bannockcounty.us
5500 S. 5th Ave, Pocatello ID 83204

City of Chubbuck

- Bridger Morrison, City Engineer; (208) 237-2430, bmorrison@cityofchubbuck.us
P.O. Box 5604, Chubbuck, ID 83202/ 5160 Yellowstone Ave, Chubbuck ID 83202

Idaho Transportation Department, District 5

- Alissa Salmore, Environmental Planner; (208) 239-3312, Alissa.salmore@idt.idaho.gov
- Greydon Wright, Operations Engineer; (208) 239-3317, greydon.wright@itd.idaho.gov
5151 S. 5th Ave, Pocatello ID 83204

Idaho State University

- Jennifer Parrott, Co-Director/ Env. Programs Manager; (208) 282-3498, parrienn@isu.edu
921 S. 8th Ave STOP 8042, Pocatello ID 83209

Prior to each of the minimum measures and other SWMP components, the responsible persons are listed and general duties described.

Legal Authority

Pocatello, Chubbuck and Bannock County have adequate legal authority through their respective Codes, noted below.

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.

Annual Report Permittee Responsibility

Each Permittee maintains relevant ordinances or other regulatory mechanisms to control pollutant discharges into and from the MS4 to meet the requirements of this GP. Y/N

ISU does not maintain the equivalent of a city code to regulate stormwater discharges. Through Idaho Code and State Board of Education Policies, ISU has the authority to implement its stormwater management programs and to control, regulate and enforce discharges to the stormwater system. Through this authority, ISU will develop an Environmental Health and Safety (EHS) Policy which will support the management of stormwater on the Pocatello Campus.

Below is a summary of each of the Permittee's unique legal authorities, which satisfy the five legal authority criteria specifically listed in the permit (Part 2.5.4):

To prohibit and eliminate illicit discharges to the MS4 –

Pocatello

- [Pocatello City Code 8.48 – Illicit Discharge and Stormwater Sewer Connection.](#)
Prohibits illicit discharges to any storm drain, including the MS4 and private drains.

Chubbuck

- [Chubbuck City Code 8.48 – Illicit Discharge and Stormwater Sewer Connection.](#)
Prohibits illicit discharges to any storm drain, including the MS4 and private drains.

Bannock County

- [Bannock County Code 15.18 – Illicit Discharge and Stormwater Sewer Connection.](#)
Prohibits illicit discharges to any storm drain, including the MS4 and private drains.

ITD

- 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). 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.

ISU

- An EHS policy will be developed by the Environmental Health and Safety Department. This policy will provide the framework for the Environmental Health and Safety Department to support the management of stormwater on the Pocatello campus.

To control the discharge of spills, dumping or disposal of materials other than stormwater to the MS4:

Pocatello

- [Pocatello City Code 8.48](#) – Illicit Discharge and Stormwater Sewer Connection. Prohibits non-stormwater and pollutant discharges to MS4;
- [Pocatello City Code 9.16.180](#) – and [9.16.190](#) – Prohibits littering/non-stormwater discharges to the municipal ROW.

Chubbuck

- [Chubbuck City Code 8.48](#) – Illicit Discharge and Stormwater Sewer Connection. Prohibits non-stormwater and pollutant discharges to MS4;
- [Chubbuck City Code 8.48.070](#) – Prohibits non-stormwater discharges to the municipal ROW.

Bannock County

- [Bannock County Code 15.18](#) – Illicit Discharge and Stormwater Sewer Connection. Prohibits non-stormwater and pollutant discharges to MS4.

ITD

- 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.

ISU

- An EHS policy will be developed by the Environmental Health and Safety Department. This policy will provide the framework for the Environmental Health and Safety Department to control the discharge of spills, dumping and disposal of materials other than stormwater to the MS4. The Environmental Health and Safety Department also manages the wastewater, oil handling and hazardous waste programs which both have plans that prohibit the discharge of spills to the MS4 and sanitary sewer.

To control the discharge of stormwater and pollutants from land disturbance and development, both during construction and after site stabilization has been achieved:

Pocatello

- [Pocatello City Code 8.44](#) – Construction Site Erosion and Sediment Control. Regulates prohibited discharges from construction sites
- [Pocatello City Code 8.52](#) – Stormwater Management. Regulates the design, operation and maintenance of permanent stormwater facilities.

Chubbuck

- [Chubbuck City Code 8.44](#) – Construction Site Erosion and Sediment Control. Regulates prohibited discharges from construction sites
- [Chubbuck City Code 8.56](#) – Stormwater Management. Regulates the design, operation and maintenance of permanent stormwater facilities.

Bannock County

- [Bannock County Code 15.17](#) – Construction Site Sediment and Erosion Control. Regulates prohibited discharges from construction sites.
- [Bannock County Code 17.52.540](#) – Stormwater Runoff. Regulates the design of permanent stormwater facilities.

PORTNEUF VALLEY STORMWATER MANAGEMENT PROGRAM

- [Bannock County Code 16.28.100](#) – Stormwater Runoff. Regulates the design of permanent stormwater facilities.

ITD

- Standard Specifications for Highway Construction Section 107.17; Operations Manual, and Best Management Practices Manual

ISU

- An EHS policy will be developed by the Environmental Health and Safety Department. This policy will provide the framework for the EHS Department to control the discharge of pollutants from land disturbance activities. The EHS Department will work with Facilities Services to consider incorporating by reference the City of Pocatello's ESC ordinance into construction contracts.

To control the contribution of pollutants from one MS4 to another interconnected MS4: All Permittees

- Intergovernmental Agreement for Roles and Responsibilities under the NPDES Municipal Stormwater Permit (Permit #IDS-028053)
<https://www.pocatello.us/443/Storm-Water-Permit>

To require local compliance with such requirements:

Pocatello

- [Idaho Code Section 50-302](#) – Promotion of General Welfare – Prescribing Penalties. Grants cities in Idaho the authority to pass ordinances and regulations and enforce ordinances by fines of up to \$1000 and/or incarceration of up to 6 months.
- [Pocatello City Code 8.48.140](#) – Violations Constitute Misdemeanors. Makes failing to comply with the provisions of the Illicit Discharge Ordinance a misdemeanor.
- [Pocatello City Code 8.44.170-200](#) – Construction Site Erosion and Sediment Control. Makes failing to comply with the provisions of this ordinance a misdemeanor, to be declared a nuisance and summarily abated, or to be enforced through administrative enforcement or civil actions.
- [Pocatello City Code 8.52.130-150](#) – Stormwater Management. Makes failing to comply with the provisions of this ordinance a misdemeanor, subject to administrative enforcement or to be declared a nuisance and summarily abated.

Chubbuck

- [Idaho Code Section 50-302](#) – Promotion of General Welfare – Prescribing Penalties. Grants cities in Idaho the authority to pass ordinances and regulations and enforce ordinances by fines of up to \$1000 and/or incarceration of up to 6 months.
- [Chubbuck City Code 8.48.140](#) – Violations Constitute Misdemeanors. Makes failing to comply with the provisions of the Illicit Discharge Ordinance a misdemeanor.
- [Chubbuck City Code 8.44.170-190](#) – Construction Site Erosion and Sediment Control. Makes failing to comply with the provisions of this ordinance a misdemeanor, to be declared a nuisance and summarily abated, or to be enforced through administrative enforcement or civil actions.
- [Chubbuck City Code 8.56.140](#) – Stormwater Management. Makes failing to comply with the provisions of this ordinance a misdemeanor, subject to administrative enforcement or to be declared a nuisance and summarily abated.

Bannock County

- [Idaho Code Section 31-714](#) – Ordinances - Penalties. Grants counties in Idaho the authority to pass ordinances and regulations and enforce ordinances by fines of up to \$1000 and/or incarceration of up to 6 months.

PORTNEUF VALLEY STORMWATER MANAGEMENT PROGRAM

- [Bannock County Code 15.18 – Illicit Discharge and Stormwater Sewer Connection.](#) Makes failing to comply with the provisions of the Illicit Discharge Ordinance a misdemeanor.
- [Bannock County Code 15.17.040 – Construction Site Sediment and Erosion Control.](#) Failing to comply with the provisions of this ordinance will yield a violation and a stop work; failure to comply with any requirement of this ordinance shall constitute a misdemeanor.

ITD

- [Standard Specifications for Highway Construction Section 107.17](#)

ISU

- The developed EHS Policy will provide the structural framework for compliance.

To carry out all inspection, surveillance, and monitoring procedures necessary to determine compliance and noncompliance with the Permit.

Pocatello

- [Pocatello City Code 8.48.100 – Monitoring of Discharges.](#) Provides for the inspection of private and public stormwater systems, and allows the City to require sampling, testing and monitoring.
- [Pocatello City Code 8.44.150 – Construction Site Erosion and Sediment Control Inspections.](#) Provides for City inspections of construction activity.

Chubbuck

- [Chubbuck City Code 8.48.100 - Monitoring of Discharges –](#) provides for the inspection of private and public stormwater systems, and allows the City to require sampling, testing and monitoring.
- [Chubbuck City Code 8.44.150 – Construction Site Erosion and Sediment Control Inspections.](#) Provides for City inspections of construction activity.

Bannock County

- [Bannock County Code 15.17.040 – Construction Site Sediment and Erosion Control Administration.](#) Provides for County inspections of construction activity.
- [Bannock County Code 15.18.040 – Illicit Discharge and Stormwater Sewer Connection Administrative Procedures.](#) Provides for the inspection of private and public stormwater systems, and allows the County to require sampling, testing and monitoring.

ITD

- [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.

ISU

- The Environmental Health and Safety Department will partner with the City of Pocatello for inspection, surveillance and monitoring assistance.

Intended Compliance Schedule

- **ISU**
 - Permit Year 3 (2022) – Develop Environmental Health and Safety Policy.

SWMP Information and Statistics

The Permittees track implementation of the SWMP. All data collected is retained for the life of the Permit, and no less than 5 years from the date of collection/publication. All data is available to IDEQ and EPA, upon request. All data is available to the public upon submission of a Public Records Request to the appropriate Permittee.

Unless noted otherwise, each permittee is responsible for retaining, tracking and submitting this SWMP information. The SWMP is available at: <https://www.pocatello.us/443/Storm-Water-Permit>.

Annual Report Permittee Responsibility

The Permittees' SWMP Document is posted on a publicly accessible website. **Y/N and link**

(Year 3 only) The Permittees' SWMP Document been updated to describe the implementation of the selected Monitoring/Assessment and/or Pollutant Reduction activities cited in Permit Part 4. **Y/N and link**

This Permittee organization regularly tracks certain activities to set priorities and assess compliance with the Permit requirements. **Y/N**

Intended Compliance Schedule

The permittees intend to use the following dates to meet the Permit's reporting requirements:

- **Annual Report** – Reflects October 1– September 30 year. Submitted to EPA by December 1 *each year*, beginning with December 1, 2020.
- **Monitoring Plan and Pollutant Reduction Activities** – Submitted to EPA by Pocatello by October 1, 2021.
- **Discharges to Impaired Waters SWMP Update** – Updated SWMP submitted to EPA by Pocatello by December 1, 2022.
- **SWMP update and Permit renewal application** – Each Permittee to provide all required information to Pocatello by January 1, 2024, for inclusion in an updated SWMP document and the Permit Renewal application. The Permit Renewal application (including the updated SWMP document) will be submitted to EPA by Pocatello by April 3, 2024.

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

It is expected that over the course of the permit, individual permittees may expand or reduce their jurisdictions within the MS4 area. All Permittee land ownership changes and jurisdictional annexations will be detailed in each Annual Report and the MS4 map will be updated accordingly.

Currently all of the permittees, except Bannock County, apply their ordinances and policies across their entire jurisdictions. As a result, permit conditions become effective upon any annexation/land acquisition. Bannock County only applies the ESC ordinance within the Pocatello Urbanized Area.

Annual Report Permittee Responsibility

7. During the reporting period, responsibility for SMWP implementation has changed due to a Transfer of Ownership or Operational Authority over a geographic portion of the MS4. The Permittees' SWMP Document has been updated to reflect these changes in responsibility for any new or transferred areas served by the MS4. **Y/N and Summarize**

B. STORMWATER MANAGEMENT CONTROL MEASURES (PERMIT PART 3)

The following sections describe the PUA Permittees' program to reduce pollutants in the MS4 discharges to the maximum extent practicable, as required by Permit Part 3. Each section summarizes the mandatory program and describes how the Permittees meet each program component.

Permit Part 3.1 Education, Outreach, and Public Involvement

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

Annual Report

Education/Outreach Comments Section
Pocatello on behalf of Permittees.

Use this Comments field to explain or discuss unique implementation schedules, summarize nature of the education, outreach, and public involvement activities conducted during the reporting period.

Summarize

Within one year of the Permit effective date, the Pocatello Urbanized Area 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 stormwater controls.
- ✓ Maintain and advertise a publicly accessible website to provide all relevant SWMP materials.

3.1.2-4 Stormwater Education Activities and Audiences

On behalf of all permittees, the City of Pocatello (unless otherwise noted) is conducting the following 8 educational outreach topics and associated activities. The intended timeline is listed below:

Youth Stormwater Education

- Target audience – K-12 students in Pocatello and Chubbuck
- Activities – Present at STEM/STEAM nights, Water Week, and other field trips.
- Timeline:
 - Annually – Conduct presentations and outreach activities.

Community Event Participation & Sponsorship

- Target audience – General public
- Activities – Provide information about stormwater BMPs and the Portneuf River Vision project by organizing events (e.g. Portneuf Valley Environmental Fair) and hosting booths at the Portneuf Valley Environmental Fair, Chamber of Commerce luncheons, Welcome Back Orange & Black (annual Idaho State University event), Bike to Work Kickoff, etc.
- Timeline:
 - Annually – Organize events and host booths.

Stormwater Pond Care

- Target audience – Commercial businesses and homeowners' associations responsible for maintaining stormwater ponds
- Activities – Develop and distribute informational brochure(s) about stormwater pond maintenance requirements, and conduct one-on-one education with parties responsible for stormwater pond maintenance.
- Timeline:
 - Permit Year 2 (2021) – Develop and distribute brochure(s) to pond owners.
 - Permit Years 2-5 (2021-2024) – Conduct one-on-one education.

Annual Report Education/Outreach *Pocatello on behalf of Permittees.*

8. The Permittees conduct an education, outreach, and public involvement program based on stormwater issues of significance in the Permittee's jurisdiction. **Y/N**

9. Target Audience - During the reporting period, the Permittees focused their education, outreach, and public involvement messages to the following audience(s). **Select all that apply**

10. Topics - During the reporting period, the Permittees focused their education, outreach, and public involvement messages on the following topics. **Select all that apply**

11. During the reporting period, the Permittees began and/or continued distribution of the selected messages/activities to the intended target audience. *Please summarize the message/activity conducted during the reporting period in the comments section below.* **Y/N and Summarize**

Changing Perceptions of the Portneuf River

- Target audience – General public
- Activities – Develop targeted social media messages about the Portneuf River's improved water quality and opportunities to recreate on/in/along the river. With watershed partners, develop floating signage and create river access points to increase river recreation. Write grants to support these activities.
- Timeline:
 - Annually – Develop and distribute targeted messages via social media.
 - Permit Years 1-2 (2020-2021) – Develop and install floating maps and river access.

River Cleanups and Restoration Activities

- Target audience – General public & watershed partner staff
- Activities – Plan and host annual river cleanup(s) to clear trash and other debris out of the Portneuf River and its banks to improve water quality and ensure floating passage. Engage citizens to help conduct stream restoration projects on the Portneuf River and its tributaries. Write grants to support these activities.
- Timeline:
 - Annually – Plan and host river cleanups and conduct restoration projects.

Open Space Trail Etiquette Education and Maintenance

- Target audience – General public (hikers, bikers, and equestrians) and agency partners.
- Activities – Participate in the development of an open space management plan in cooperation with other land management agencies to reduce illegal trail construction and improve trail and open space management. Partner with local running/biking clubs and shops to provide trail etiquette and maintenance materials and classes on topics such as pet waste management, prevention of trail widening, and other erosion issues. Implement trail, road, stream and open space restoration projects. Write grants to support these activities.
- Timeline:
 - Permit Years 2-3 (2021-2022) – Develop open space management plan.
 - Permit Year 4 (2023) – Develop and distribute trail etiquette/maintenance materials.
 - Annually – Apply for grants to support trail maintenance activities.

Clean Streets Campaign

- Target audience – General public (residents) and businesses
- Activities – Implement yard waste education program to educate residents and businesses about best practices for residential lawn care and its potential to contaminate stormwater. This includes distributing flyers, coordinating with local media to run existing TV ads and other materials, erecting temporary message boards regarding covered load requirements, and driving street sweepers/other vehicles branded with information encouraging residents to keep grass clippings out of the street.
- Timeline:
 - Annually – Implement programs.

Business and Household Hazardous Waste Management

- Target audience – General public and local businesses
- Activities – Advertise and host Free Household Hazardous Waste Collection program (Bannock County), and support free electronic waste collection. Develop and distribute flyers on mobile cleaning BMPs.
- Timeline:
 - Permit Year 1 (2020) – Develop Mobile Business Cleaning flyer.
 - Annually – Distribute Mobile Business Cleaning flyer.
 - Annually – Implement Household Hazardous Waste programs.

3.1.5 Assessment

Pocatello has previously assessed community stormwater awareness and behaviors. This data, along with ISU research on community awareness and behavior related to water quality in general will be used to develop assessment metrics during this permit cycle, and refine implementation of outreach activities.

Intended Compliance Schedule

- **Pocatello -**
 - Permit Year 2 (2021) – Develop assessment plan.

Annual Report Education/Outreach *Pocatello on behalf of Permittees.*

12. During this reporting period, the Permittees assessed, or participated in efforts to assess, the understanding and adoption of intended behaviors by the target audience. *If Yes; In the Comments section below, please summarize efforts to assess the selected education, outreach and public involvement activities conducted during the reporting period. If information is available, describe how this information is used to improve the education/outreach efforts.* **Y/N**

3.1.6 Tracking

Pocatello tracks and maintains records of the education, outreach and public involvement activities, using an electronic database.

3.1.7 Education on SWMP Control Measures

Pocatello organizes a robust ESC education program for contractors on behalf of the permittees. This is further described in Section 3.3. Pocatello also conducts annual training for local engineers and site designers on any changes to City permanent stormwater control requirements.

Intended Compliance Schedule

- **Pocatello -**
 - Permit Year 2 (2021) – Develop plan for implementing additional post-construction training on behalf of all permittees.

3.1.8 Publicly Accessible Website

Pocatello maintains a website with information on the Permittees' collective SWMP implementation, points of contact, and educational materials listed above – <https://www.pocatello.us/421/Storm-Water-Management>.

Permit Part 3.2 Illicit Discharge Detection and Elimination

To prohibit and eliminate illicit discharges to the MS4, the Pocatello Urbanized Area 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.

Annual Report IDDE

16. To the extent allowable pursuant to authority granted under Idaho law, each Permittee organization conducts and enforces a program to detect and eliminate illicit discharges into the MS4. **Y/N**

Comments - Use this Comments field to explain any unique implementation schedules, highlight investigation results or follow-up actions, discuss subsequent enforcement actions, etc. that were conducted during the relevant reporting period. **Summarize**

The Permittees must continue to implement and enforce a program to detect and eliminate illicit discharges into the MS4. An illicit discharge is any discharge to an MS4 that is not composed entirely of stormwater. Exceptions are conditional as identified in Part 2.4 of this permit.

Responsible Persons

Pocatello – The program is overseen and implemented by staff in the Science and Environment Division. Public Works staff clean up minor illicit discharges (e.g. from traffic accidents or small spills on City streets by unknown citizens). Staff from Water Pollution Control work with Environmental Division staff to manage illicit discharges related to sanitary sewer waste. Fire Department staff manage hazardous spills, in conjunction with state officials as needed. Pocatello Science and Environment Division staff also coordinate illicit discharge training for permittee staff.

Chubbuck – The program is overseen and implemented by staff in the Public Works Department. Streets Department staff and Emergency Services staff clean up minor illicit discharges (e.g. from traffic accidents or small spills on City streets by unknown citizens). Staff from the Water and Wastewater Department manage illicit discharges related to sanitary sewer waste. Emergency Services staff manage hazardous spills, in conjunction with state officials as needed. Pocatello's Science and Environment Division staff provides illicit discharge training for permittee staff.

Bannock County – The program is overseen and implemented by staff in the County Engineering and Planning and Development Departments. Public Works staff clean up minor illicit discharges (e.g. from traffic accidents or small spills on City streets by unknown citizens). Staff from both 1) Engineering and 2) Planning and Development manage illicit discharges related to sanitary sewer waste. Local Fire District staff manage hazardous spills, in conjunction with state officials as

needed. Pocatello Science and Environment Division staff also coordinate illicit discharge training for permittee staff.

ITD – 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). ITD staff working in the MS4 area participate in the City of Pocatello on-line illicit discharge training.

ISU – This program is overseen and implemented by the Environmental Health and Safety (EHS) Department. Staff from EHS can clean up minor illicit discharges, but larger discharges are coordinated through the City of Pocatello. Illicit discharges can be reported directly to the Environmental Health and Safety Department by phone or email. ISU partners with the City of Pocatello for the illicit discharge detection program and utilizes the City of Pocatello's online training.

3.2.2 MS4 Map and Outfall Inventory

The Permittees have developed MS4 map(s) (and associated inventories). Portions of the map that are not yet complete are listed below under 'Intended Compliance Schedule.'

The completed MS4 maps will include –

- Complete MS4 System and associated WOTUS that receive discharges;
- Permittee-owned/maintained maintenance and storage facilities;
- Permittee-owned streets and parking lots;
- Outfalls; and
- Outfalls with ongoing dry weather flows.

Annual Report IDDE

17. Each Permittee organization maintains a current MS4 map and outfall inventory as described in Permit Part 3.2.2. **Y/N**

The permittees MS4 system map has not changed significantly in the last few years, except for the addition of new subdivision systems, and further refinement of the map based on ongoing field work. Additionally, portions of drainage system that are not connected to WOTUS have been removed from the map. Congruently, many of the permittees maintenance and storage facilities are not located within the MS4; all of their water infiltrates into the ground. Only permittee facilities that discharge to the MS4/WOTUS will be depicted.

Most of the MS4 outfalls are located in either the concrete portion of the Portneuf River, or in the piped section of Pocatello Creek (where stormwater catch basins are also outfalls to the creek). This makes it easy to observe dry weather flow.

- Outfalls with ongoing dry weather flows from irrigation returns are being identified and will be included on the map.
- There are no known outfalls with ongoing dry weather flows from groundwater seepage.

MS4 map(s) are available at –

<https://pocatello.maps.arcgis.com/apps/webappviewer/index.html?id=fa9b44d8278049f2a67ad286f7baec59>

PORTNEUF VALLEY STORMWATER MANAGEMENT PROGRAM

Intended Compliance Schedule

All Permittees will continue to update and refine their maps and will submit complete electronic maps and associated databases to EPA by April 3, 2024. Work to be completed includes:

- **Pocatello** –
 - Annually – Update dry weather flow map (including outfalls with ongoing flows from irrigation returns/groundwater seepage), based on dry weather flow investigations.
 - Year 2 (2021) – Add all MS4 interconnection points, outfalls, ongoing dry weather flows and WOTUS to online map.
- **All** –
 - Annually – Update jurisdictional limits layers based on new annexations/growth.
 - Annually – Update map inventory based on growth and any map refinement investigations.
 - Years 2-3 (2021-2022) – Add to the map with the requirements of 3.2.2.7 (e.g. all permittee maintenance facilities, roads and parking lots).

3.2.3 Ordinance or Other Regulatory Mechanisms

The permittees illicit discharge programs have been established in accordance with the requirements of their Illicit Discharge and Stormwater Sewer Connection Ordinances, which identify and prohibit non-stormwater and pollutant discharges to the MS4.

- **Pocatello** – [Pocatello City Code 8.48](#) – Illicit Discharge and Stormwater Sewer Connection.
- **Chubbuck** – [Chubbuck City Code 8.48](#) – Illicit Discharge and Stormwater Sewer Connection.
- **Bannock County** – [Bannock County Code 15.18](#) – Illicit Discharge and Stormwater Sewer Connection.
- **ITD** – ITD BMP Manual NS-6 Illicit Connection / Illegal Dumping or Discharge requires compliance with applicable federal, state and local requirements in which the state roadway facilities are located.
- **ISU** – Idaho State University does not maintain the equivalent of a city code to regulate stormwater discharges. Through Idaho Code and State Board of Education Policies, Idaho State University has the authority to implement its stormwater management programs and to control, regulate and enforce discharges to the stormwater system. Through this authority, ISU will develop a policy that will provide the framework for the management of stormwater.

Annual Report IDDE

18. To the extent allowable pursuant to authority granted under Idaho law, each Permittee organization prohibits non-storm water discharges into the MS4 (except those identified in Permit Part 2.4) through an ordinance or other regulatory mechanism. *If yes, please provide citation/web address to the ordinance/regulatory mechanism - Y/N and link*

Intended Compliance Schedule

- **ISU**
 - Permit Year 3 (2022) – Develop EHS Policy.

3.2.4 Illicit Discharge Complaint Reporting and Response Program

Pocatello – The City addresses illicit discharges using multiple mechanisms, including operating a stormwater hotline number, as well as an app for citizen reports of stormwater pollution problems. City staff also respond to direct reports of stormwater violations from citizens, employees and other agencies. Stormwater staff begin responding to these complaints within two business days. Complaints and their associated investigations and results are tracked in a database to ensure appropriate follow-up.

Chubbuck – The City addresses illicit discharges through response to reports of stormwater violations received from citizens, employees and other agencies. City staff begin responding to these complaints within two business days. Complaints and their associated investigations and results will be tracked in a database to ensure appropriate follow-up.

Chubbuck – The City addresses illicit discharges through response to reports of stormwater violations received from citizens, employees and other agencies. City staff begin responding to these complaints within two business days. Complaints and their associated investigations and results will be tracked in a database to ensure appropriate follow-up.

Bannock County – The County addresses illicit discharges through response to reports of stormwater violations received from citizens, employees, and other agencies. County staff will respond to these complaints. Complaints and their associated investigations and results will be logged in a future developed database.

ITD – Illicit discharge reporting and response is handled as part of project contract requirements, ITD BMP Manual NS-6, and as per applicable codes and ordinances where the state roadway facility is located.

ISU – ISU uses multiple mechanisms for complaint response. ISU utilizes the City of Pocatello's stormwater hotline number but also accepts illicit discharge complaints through internal phone and emails. If a complaint is located on ISU property, the City of Pocatello and ISU coordinate a response. ISU responds to these complaints within 2 business days and tracks complaint resolution through a Google Form that captures spills on campus.

Annual Report IDDE

19. Each Permittee organization maintains a dedicated telephone number, email address, and/or other means for the public to report illicit discharges, *If yes, please provide phone number/web address.* **Y/N and link**

20. Each Permittee organization responds and investigates illicit discharge complaints or reports within two working days. **Y/N**

21. Number of Public Complaints/Reports Received during this Reporting Period. **#**

22. Number of Illicit Discharge Complaints/Reports Investigated through field visits, sampling or other follow-up action. **#**

23. Number of Illicit Discharge Complaints/Reports Resolved. **#**

Intended Compliance Schedule:

- **Bannock County**
 - Permit Year 3 (2022) – Bannock County will develop a system to enable staff to begin responding to and tracking IDDE complaints within 2 business days.
- **Chubbuck**
 - Permit Year 2 (2021) – Chubbuck will implement a tracking program for IDDE complaints.

- **ITD**

- Permit Year 2 (2021) – ITD will update its BMP Manual to include responding to IDDE complaints within 2 business days.

3.2.5 Dry Weather Outfall Screening Program

Pocatello conducts dry weather discharge screenings for all permittees. In 2020, outfalls were prioritized for inspection, based on previous reconnaissance and mapping activities. At this time a written plan was also developed for field screening methodologies and associated trigger thresholds for follow-up actions.

At least 50 outfalls are selected each year for visual dry-weather screening, in accordance with Permit requirements, following the schedule within the Permittees' Dry Weather Outfall Screening Plan. When dry weather flows from the MS4 are identified, the source is identified and appropriate action is taken to eliminate such flows, to the extent allowable pursuant to authority granted to the City under Idaho law. Monitoring and tracking of discharges occur according to the City's written dry weather monitoring plan.

Any outfalls with ongoing dry weather flows are described under Section 3.2.2.

3.2.6 Follow Up

All reoccurring illicit discharges are investigated by the City of Pocatello within 30 days of detection. Due to the limited nature of the Permittees' MS4 system, no on-going illicit discharges to the system have been observed. If an on-going illicit discharge is observed in the future, the City of Pocatello will address and eliminate the source within 60 days.

Follow up reports for ongoing dry weather discharge (see 3.2.5) that is associated with irrigation return flows and/or groundwater seepage are included with Annual Reports. These follow-up reports are completed by the City of Pocatello on behalf of all permittees.

Annual Report IDDE

Pocatello on behalf of Permittees.

24. The Permittees conduct a dry weather analytical and field screening monitoring program to identify non-stormwater flows from MS4 outfalls. **Y/N**

25. During the reporting period, each Permittee organization used its written protocols to prioritize and identify MS4 outfalls for dry weather discharge investigation. **Y/N**

26. Total Number of MS4 Outfalls in the Permittee's jurisdiction of the Permit Area - **#**

27. During the reporting period, the Permittees completed visual dry weather screening on at least 50 MS4 outfalls. **Y/N**

28. Of the 50 outfalls screened during the reporting period - How many outfalls were discharging during dry weather? How many of these identified dry weather discharges were sampled or otherwise investigated to determine the discharge source? How many of the identified dry weather discharges resulted in the Permittee action to address and eliminate the discharge source? **#**

29. During this reporting period, how many of the Permittee's MS4 outfalls have been identified as having dry weather flows caused by irrigation return flow or ground water seepage? Number of outfalls identified this reporting period. Total number of MS4 outfalls identified to date, as having dry weather flows from irrigation or groundwater seepage. **#**

3.2.7 Prevent and Respond to Spills to the MS4

IDDE training materials for Permittee staff provide information on spill prevention and response at permittee-owned facilities. The O&M manual(s) for these facilities provide/will provide additional information on responding to and reporting on spills, as well as guidance to prevent spills.

Pocatello, Chubbuck and Bannock County – The Pocatello, Chubbuck and Volunteer (in the County) Fire Departments are responsible for initially responding to spills involving hazardous materials. They request regional HazMat team assistance through the Idaho EMS State Communication (StateComm). Pocatello Fire Department staff maintains HazMat training and generally respond to about two such spills/year.

Annual Report IDDE

30. Each Permittee organization maintains written spill response procedures and coordinates appropriate spill prevention, containment and response activities with other organizations in the Permit Area to ensure maximum water quality protection at all times. **Y/N**

ITD – 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.

ISU – The EHS Department responds to spills on ISU property. Minor spills can be handled by EHS staff. If the spill is larger or immediately threatens human health or the environment, EHS relies on the City of Pocatello Fire Department who can request regional HazMat team assistance through the Idaho EMS State Communication (StateComm).

3.2.8 Proper Disposal of Used Oil and Toxic Materials

Pocatello/Chubbuck/Bannock County – Both Cities coordinate with Bannock County to facilitate the collection of Household Hazardous Waste (HHW) to ensure proper disposal. The program consists of a permanent collection facility located at the Bannock County landfill, which is open on the 1st Saturday of the month from April – October. There is no charge to residential customers to drop off HHW.

Once the waste is removed from vehicles, it is separated into 50 gallon drums or stacked in the containment building if it is reusable. The antifreeze, oil, and vehicle batteries are provided to a local company through agreement to be recycled or reused, and the remaining materials are either properly disposed of as hazardous waste or recycled. The county contracts with a hazardous waste company to dispose of the non-reuseable/recycleable materials.

Annual Report IDDE

31. Each Permittee organization coordinates with appropriate local entities to educate employees and the public of the proper management and disposal or recycling of used oil, vehicle fluids, toxic materials, and other household hazardous wastes. **Y/N**

Additionally, the City of Pocatello collects household electronics free of charge year-round at its Public Works Annex facility (Sanitation shop).

Permittee staff and the public are made aware of these options through repeated mass media and social media outreach by the Bannock County Landfill and both cities Sanitation Departments. Additionally, the City of Pocatello's Sanitation website and Stormwater website provide guidance on proper disposal for these items and many others that can be recycled.

ITD – Proper disposal of oil and toxic materials is handled as part of project contract requirements under ITD Standard Specifications for Highway Construction, ITD BMP Manual Waste Management chapters, and as per applicable codes and ordinances where the state roadway facility is located.

ISU – EHS manages and coordinates a hazardous waste and used oil disposal program at the Pocatello campus. ISU is a large quantity generator of hazardous waste and maintains contractual agreements for the disposal of hazardous waste, industrial waste and used oil.

3.2.9 Illicit Discharge Detection and Elimination Training for Staff

The City of Pocatello provides all permittees with training materials for new and existing staff.

Pocatello – IDDE training is provided to new and existing employees in positions where this training is applicable, and this training is shared with the permittees. IDDE training for City employees will be incorporated into the City's online training management system to enhance the effective delivery of this training. Where applicable, online training is supplemented with customized in-person training to meet the needs of specific departments or work groups.

Annual Report IDDE

32. Each Permittee organization's staff responsible for investigating, identifying and eliminating illicit discharges, spills, and illicit connections into the MS4 are trained to conduct such activities. **Y/N**

Chubbuck – IDDE training is provided to new and existing employees in positions where this training is applicable. Initial and follow-up training is provided through web-based training resources provided by the City of Pocatello. Where applicable, online training is supplemented with customized in-person training to meet the needs of specific departments or work groups.

Bannock County – IDDE training is programmed to be provided to new and existing employees in positions where this training is applicable. For staff working within the MS4 area, the County will utilize the City of Pocatello IDDE online training management system to provide training materials for new and existing staff.

ITD – For staff working within the MS4 area, ITD will utilize the City of Pocatello IDDE online training management system to provide training materials for new and existing staff.

ISU – ISU will utilize the City of Pocatello's IDDE online training and tracks attendance through a spreadsheet.

Intended Compliance Schedule

- **Pocatello –**
 - **Permit Year 2 (2021)** – Develop/update online training materials and delivery system that can be used by all permittees.
- **All permittees –**
 - **Permit Year 2 (2021)** – Review and refine list of applicable employee positions for receiving training, material delivery method, as well as tracking method. Develop process for ensuring that all new applicable employees receive training within 6 months of employment.

Permit Part 3.3 Construction Site Runoff Control

To control the discharge of stormwater and pollutants from land disturbance during the construction phase, the Pocatello Urbanized Area 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.

The Permittees have each established a construction site erosion and sediment control program and implement these programs in accordance with approved ordinances and policies for construction site runoff, erosion and sediment. These programs regulate both public and private construction activities.

Responsible Persons

Pocatello – The program is managed by the Engineering Department, including conducting most of the ESC inspection and enforcement activities. Additional ESC inspections occur alongside trade inspections by Building Department staff. Pocatello Science and Environment Division staff manage the ESC training and certification program for permittee staff and contractors working within the Portneuf Valley, and provide ESC program support.

Chubbuck – The program is overseen by staff in both the Development Services Department and the Building Department, depending upon the type of project. ESC inspections are performed by staff from both departments. Pocatello Science and Environment Division staff also manage the ESC training and certification program for Chubbuck staff and contractors working within the Portneuf Valley.

Bannock County – The program is overseen by staff in the County Engineering Department, the Planning and Development Department, and Building Department depending upon the type of project. ESC inspections are performed by staff within the above departments. Pocatello Science and Environment Division staff also manage the ESC training and certification program for County staff and contractors working within the Portneuf Valley.

ITD – District environmental and engineering staff enforce NPDES rules and requirements to ensure compliance with CWA under NPDES and state water quality rules. ITD District and HQ trainers manage the environmental pollution prevention training and certification program for ITD.

ISU – Projects which occur on state land and are greater than or equal to one acre are operated by the Division of Public Works and are covered under the terms of the EPA issued NPDES General Permit for Stormwater Discharge from Construction Activities in Idaho, Permit #IDR12-0000. For projects under 1 acre, ISU will consider incorporating the City of Pocatello's ESC into construction documents.

3.3.2 Ordinance and/or other regulatory mechanism

Pocatello, Chubbuck and Bannock County's construction site runoff control programs are established in accordance with the requirements of their Construction Site Erosion and Sediment Control Ordinances. These identify general requirements and prohibitions on construction site runoff, permitting and fee authorities, plan review and approval standards, erosion and sediment control best management practices and standards, training and certification program details, administration, inspection, and enforcement.

Annual Report Construction Sites

33. Each Permittee organization uses an ordinance or other regulatory mechanism to require erosion, sediment, and waste material management controls at construction project site activity that results in land disturbance of one (1) or more acres and discharges to the MS4. **Y/N**

These ordinances provide construction site controls that are at least as stringent as the federal Construction General Permit requirements.

- **Pocatello** – [City Code 8.44](#) – Construction Site Erosion and Sediment Control
- **Chubbuck** – [City Code 8.44](#) – Construction Site Erosion and Sediment Control.
- **Bannock County** – [County Code 15.17](#) – Construction Site Erosion and Sediment Control Currently only applies to sites that disturb over ¼ acre of ground.

ITD – ITD Standard Specifications for Highway Construction require that any ITD project must either have a Pollution Prevention Plan (PPP) or, if the project has coverage under the Construction General Permit (CGP), then a Stormwater Pollution Prevention Plan (SWPPP) is required. Standard project contract specifications developed to implement this policy are continuously being refined with each subsequent update to ITD standard specifications.

ISU – The Environmental Health and Safety Department will adopt an EHS Policy which will serve as the framework for construction site runoff. In addition, any incorporated references into service contracts will assist with compliance.

Intended Compliance Schedule

- **Bannock County**
 - Permit Year 4 (2023) – Modify ordinance to cover all sites that are over 1 acre or part of a common plan of development.
- **ISU**
 - Permit Year 4 (2023) – Develop an EHS Policy that serves as the framework for ESC.
 - Permit Year 4 (2023) - Incorporates the City of Pocatello's ESC Program by reference into construction documents.

3.3.2.1 CGP Referral

Contractors disturbing 1 or more acres (or part of a common plan of development over 1 acre) are referred to obtain NPDES coverage under the CGP in the following manner:

Pocatello/Chubbuck – The required training for all contractors disturbing over 10 cy of material describes conditions under which CGP coverage is needed, and the process for obtaining such coverage, or a waiver. Additionally, standard plan notes and The Portneuf Valley Stormwater Design Manual also refer contractors to obtain CGP coverage, when warranted by project size.

Bannock County – The required training for all contractors disturbing over ¼ acre of material describes conditions under which CGP coverage is needed, and the process for obtaining such coverage, or a waiver.

ITD – ITD maintains policy that requires all projects to have sediment and erosion control protocols in place during construction. ITD Standard Specifications for Highway Construction require that any ITD project must either have a Pollution Prevention Plan (PPP) or, if the project has coverage under the Construction General Permit (CGP), then a Stormwater Pollution Prevention Plan (SWPPP) is required. Standard project contract specifications developed to implement this policy are continuously being refined with each subsequent update to ITD standard specifications.

ISU – The Environmental Health and Safety Department will work with Facilities Services to put a CGP referral statement in service contracts.

Intended Compliance Schedule

- **ISU**
 - Permit Year 3 (2022) – Incorporate a CGP referral in service contracts.
- **Bannock County**
 - Permit Year 3 (2022) – Adopt Portneuf Valley Stormwater Design Manual.

3.3.3 Construction Site Runoff Control Specifications

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:

Pocatello

- Portneuf Valley Stormwater Design Manual (adopted 2016)
- Idaho DEQ Catalog of Stormwater Best Management Practices for Idaho Cities and Counties
- Idaho Construction Site Erosion and Sediment Control Field Guide
- City stormwater website – <https://stormwater.pocatello.us>

Chubbuck

- Portneuf Valley Stormwater Design Manual (adopted 2016)
- Idaho DEQ Catalog of Stormwater Best Management Practices for Idaho Cities and Counties
- Idaho Construction Site Erosion and Sediment Control Field Guide

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Bannock County

- Portneuf Valley Stormwater Design Manual
- Idaho DEQ Catalog of Stormwater Best Management Practices for Idaho Cities and Counties
- Idaho Construction Site Erosion and Sediment Control Field Guide

ITD

- Idaho Transportation Department Best Management Practices Manual

ISU

- Portneuf Valley Stormwater Design Manual
- Idaho DEQ Catalog of Stormwater Best Management Practices for Idaho Cities and Counties
- Idaho Construction Site Erosion and Sediment Control Field Guide
- City stormwater website – <https://stormwater.pocatello.us>

3.3.4 Preconstruction Site Plan Review

Pocatello – The City's Engineering Department reviews all ESC plans for permit compliance. Single family homes and duplexes are considered lower-risk and do not generally require a site-specific ESC plan (unless they are on slopes >15%), but must still follow the ESC ordinance requirements on the ground. Site-specific ESC plans are required to be prepared by an engineer, with review by City Engineering staff trained in ESC plan review. If a site-specific ESC plan is required, it is uploaded to the City's e-plan review tool by the applicant. After Builder Permit staff assign each project a permit #, Engineering staff provide comments and plan notes and enter this information, along with contact information for the project's ESC certified person, into the City's permit database. Project plans and documents are available to the public by request.

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34. Each Permittee organization requires construction site operators to submit construction site plans for projects disturbing one (1) or more acres for Permittee review.
Y/N

Chubbuck – The City's Development Services Department reviews ESC plans for permit compliance for new development and redevelopment projects. The City's Building Department reviews ESC plans for single family homes and duplexes. Single family homes and duplexes are considered lower-risk and typically do not require a site-specific ESC plan, but must still follow the ESC ordinance requirements on the ground. Site-specific ESC plans are required to be prepared by an engineer, with review by Development Services staff trained in ESC plan review. Development Services staff assign each project a permit-#, provide comments and plan notes, and enter this information, along with contact information for the project's ESC certified staff, into the database for inspector use. Project plans and documents are available to the public by request.

Bannock County – The County's Engineering Department reviews ESC plans for permit compliance for new development and redevelopment projects. The City's Building Department reviews ESC plans for single family homes and multi-residential units. Single family homes and multi-residential units are considered lower-risk and typically do not require a site-specific ESC plan, but must still follow the ESC ordinance requirements on the ground. New development and re-development site-specific ESC plans are required to be prepared by an engineer, with review by County Engineering staff. Engineering staff assign each development or re-development project a permit-#, provide comments and plan notes, and enter this information, along with

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contact information for the project's ESC certified staff, into the database for inspector use. Project plans and documents are available to the public by request.

ITD – 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.

ISU – The Environmental Health and Safety Department intends to require that all construction projects submit ESC plans for review by the City of Pocatello Engineering Department.

Intended Compliance Schedule

- **ISU**
 - Permit Year 4 (2023) – Develop guidance requiring all projects to meet City of Pocatello standards for ESC, including securing an applicable City permit.

3.3.5 Construction Site Inspection and Enforcement

Pocatello – All permitted construction sites within the City's jurisdiction are subject to inspection for compliance with the ESC plan and/or permit conditions. If a construction project does not have a permit and stormwater violations are observed, education, enforcement, and permitting may be used to correct the situation. Inspections consist of visually observing non-stormwater discharges and stormwater runoff, checking ESC plans, assessing the effectiveness of the BMPs installed, answering operator questions, and filing an electronic report.

The ESC permit risk level/site priority is determined during the pre-construction permit intake process based on the project's ESC permit type, size, and location of the project. If a construction site has been issued an ESC Site Specific Permit the operator must schedule a Site Preparation Inspection at the start of construction to verify that BMPs listed in the ESC plan are properly installed. Once a project is in progress, Engineering staff schedule and implement inspections based on project priority and status until the project is complete, stabilized and the ESC permit is terminated. If violations occur or corrective actions are needed during the course of the project, additional targeted follow-up or enforcement inspections are conducted at the site. A database is used to track inspection activity, including results and enforcement activity, for all active ESC permits for reporting, program evaluation and monitoring.

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35. Each Permittee organization inspects construction sites that disturb one (1) or more acres to ensure compliance with applicable requirements for erosion, sediment and waste material management controls.

Y/N

36. Each Permittee organization inspects construction sites using an inspection prioritization system. **Y/N**

Comments. Use this Comments field to explain unique implementation schedules, summarize the number of site inspections, follow-up actions, and/or any subsequent enforcement actions, etc. that were conducted during the relevant reporting period.

Summarize

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Chubbuck – All permitted construction sites within the City’s jurisdiction are subject to inspection for compliance with the ESC plan and/or permit conditions. If a construction project does not have a permit or stormwater violations are observed, education, enforcement, and permitting may be used to correct the situation. Inspections consist of visually observing non-stormwater discharges and stormwater runoff, checking ESC plans, assessing the effectiveness of the BMPs installed, and answering operator questions.

Prior to the start of construction, inspections are performed to verify that BMPs listed in the ESC plan are properly installed. Once a project is in progress, inspections occur alongside regular engineering and building trade inspections until the project is complete, stabilized and the ESC permit is terminated. If violations occur or corrective actions are needed during the course of the project, additional targeted follow-up or enforcement inspections are conducted at the site.

Bannock County – All permitted construction sites within the County’s jurisdiction are subject to inspection for compliance with the ESC plan and/or permit conditions. If a construction project does not have a permit or stormwater violations are observed, education, enforcement, and permitting may be used to correct the situation. Inspections consist of visually observing non-stormwater discharges and stormwater runoff, checking ESC plans, assessing the effectiveness of the BMPs installed, and answering operator questions.

Once a project is in progress, inspections occur alongside regular engineering and building trade inspections until the project is complete, stabilized and the ESC permit is terminated. If violations occur or corrective actions are needed during the course of the project, additional targeted follow-up or enforcement inspections are conducted at the site.

ITD – ITD has oversight on all department construction projects and has standards in place via contract specifications and standard specifications to inspect ITD construction projects and maintain compliance through contractual language which refers to compliance with the Clean Water Act. For projects requiring a NPDES CGP, inspection frequencies are determined by the CGP and are documented in ITD Form 2802.

ISU – The Environmental Health and Safety Department in partnership with the City of Pocatello can inspect construction projects on the Pocatello Campus. If violations are observed, the Environmental Health and Safety Department works with the Project Manager or Maintenance Manager to resolve and educate.

Intended Compliance Schedule

- **Bannock County**
 - Permit Year 3 (2022) – Incorporate construction site inspections scheduling into the current permitting program and include dialog boxes to report conditions of the inspection.
- **ISU**
 - Permit Year 4 (2023) – Begin implementing ESC inspections by City of Pocatello staff, per City Code 8.44.

3.3.6 Enforcement Response Policy for Construction Site Runoff Control

Pocatello – City staff administer enforcement action for non-compliance in accordance with City Code 8.44. Violation of any provision or failure to comply with any requirement of City Code 8.44 results in an escalating enforcement action. This also includes work without permits, and cases requiring civil or criminal citations. City Code 8.44 provides for administrative enforcement as well civil and administrative penalties. A summary of the City's ERP is available on the City's ESC webpage: <https://www.pocatello.us/423/Erosion-Sediment-Control-ESC>

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37. Each Permittee organization implements a written escalating enforcement response policy or plan (ERP) for construction site runoff control. **Y/N**

Chubbuck – City staff administer enforcement action for non-compliance in accordance with City Code 8.44. Violation of any provision or failure to comply with any requirement of City Code 8.44 results in an escalating enforcement action. This also includes work without permits, and cases requiring civil or criminal citations. City Code 8.44 provides for administrative enforcement as well civil and administrative penalties.

Bannock County – County staff administer enforcement action for non-compliance in accordance with County Code 15.17. Violation of any provision or failure to comply with any requirement of the above ordinance could result in an escalating enforcement action. This also includes work without permits, and cases requiring civil or criminal citations. County Ordinance provides for administrative enforcement as well civil and administrative penalties.

ITD – ITD relies on contract specifications and the Idaho Transportation Department 2018 Standard Specifications for Highway Construction ITD for enforcement of ITD's policies for construction site runoff control. For projects requiring a NPDES CGP, enforcement actions are also tracked on the 2802 form as part of CGP documentation.

ISU – The Environmental Health and Safety Department will adopt an EHS Policy which will serve as the regulatory mechanism for construction site runoff. In addition, any incorporated references into service contracts will assist with compliance.

Intended Compliance Schedule

- **ISU**
 - Permit Year 4 (2023) – ISU will require all projects to follow City of Pocatello Code for ESC.

3.3.7 Construction Runoff Control Training for Staff

All – On behalf of all the Permittees, Pocatello has adapted the Boise-area construction site erosion and sediment control training and certification program and implements a site-specific Erosion and Sediment Control training program for the Portneuf Valley in Eastern Idaho. Certifications are valid for 3-years. The 3-hour class is geared towards site operators and includes information on stormwater regulations, permit processes, erosion and sediment controls, environmental awareness, and pollution prevention practices for construction activities.

The classes for contractors are taught through Idaho State University using qualified instructors who are approved by the City of Pocatello. The classes for Permittee staff are provided by the City of Pocatello using qualified Science and Environment Division staff. Instructors are required to submit a resume to the City detailing their educational history and experience in the area of erosion control. They must also be able to demonstrate knowledge of the principles of erosion; sediment transport; erosion and sediment control technology, implementation, and maintenance; and, local and federal ordinances regulating erosion and sediment control.

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38. Each Permittee organization ensures that all persons responsible for preconstruction site plan review, site inspections, and enforcement of construction site runoff control requirements are appropriately trained to conduct such activities – specifically, this organization provides orientation and training for new staff working on construction runoff control issues within the first six (6) months of employment. **Y/N**

Permittee inspection and plan review staff maintain the following certifications and training:

Pocatello – Inspectors and plan reviewers are required to have current certifications in erosion and sediment control and attend annual field training events. The training includes regulatory background on erosion control and stormwater management and information on what to do if issues are observed at a construction project. All new staff working on construction runoff control issues are trained within six months of employment.

Chubbuck – Inspectors and plan reviewers are required to have current certifications in erosion and sediment control. The certifications include regulatory background on erosion control and stormwater management and information on what to do if issues are observed at a construction project. All new staff working on construction runoff control issues are trained within six months of employment.

Bannock County – Inspectors and plan reviewers will be required to have current certifications in erosion and sediment control. The certifications include regulatory background on erosion control and stormwater management and information on what to do if issues are observed at a construction project. All new staff working on construction runoff control issues will be trained within six months of employment.

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.

ISU – Employees involved in construction projects or ground disturbing activities attend training offered by the City of Pocatello.

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Intended Compliance Schedule

- **ISU**
 - Permit Year (4) (2023) – Develop a tracking spreadsheet for ESC employee training.
- **Bannock County**
 - Permit Year 4 (2023) – Update Engineering Staff Construction Site ESC training requirements, and complete required training.

Permit Part 3.4 StormWater Management for Areas of New Development and Redevelopment

To control the discharge of stormwater and pollutants from land disturbance and development, after construction is completed, the Permittees must:

- ✓ Require the installation and long-term maintenance of permanent stormwater controls at new development and redevelopment project sites that result from land disturbance of 1 acre or more;
- ✓ Permanent stormwater 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, stormwater treatment must be required that can attain an equal or greater level of water quality benefits as onsite retention of stormwater 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 stormwater 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 stormwater 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 stormwater controls; and
- ✓ Ensure the appropriate Permittee staff is trained to conduct these activities.

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Comments. Use this Comments field as necessary to explain any unique implementation schedules, summarize inspections, actions, etc. that were conducted during the relevant reporting period.
Summarize.

At a minimum, the Permittees must 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 implemented by the Permittees must ensure that permanent controls or practices are utilized at each new development and redevelopment site to protect water quality.

Responsible Persons

Pocatello – The program is overseen by staff in the Science and Environment Division, with Engineering Department staff managing updates to the ordinance and Portneuf Valley Stormwater Design Manual. Engineering staff also review all new and redevelopment projects for compliance with the manual. Science and Environment Division staff will manage the

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inspection program for operation and maintenance of private stormwater facilities. Street department staff manage the operations and maintenance of public stormwater facilities.

Chubbuck – The program is overseen by staff in the Development Services Department and Building Department, depending upon the type of project. Development Services and Building staff review all new and redevelopment projects for compliance with the Portneuf Valley Stormwater Design Manual. Public Works staff will manage the inspection program for operation and maintenance of private stormwater facilities. Street Department staff manage the operations and maintenance of public stormwater facilities.

Bannock County – The program is overseen by staff in the Engineering Department and the Planning and Development Department, depending upon the type of project. Engineering staff will oversee and implement the program for operation and maintenance of private stormwater facilities. County Road and Bridge Department staff manage the operations and maintenance of public stormwater facilities.

ITD – 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.

ISU – The Environmental Health and Safety Department will adopt an EHS Policy which will serve as the regulatory mechanism for stormwater control. In addition, any incorporated references into service contracts will assist with compliance.

3.4.2 Ordinance and/or Other Regulatory Mechanism

Pocatello and Chubbuck – Pocatello and Chubbuck regulate stormwater runoff from all new and redevelopment projects within City limits. The Stormwater Management Ordinance (City Code 8.52) establishes Stormwater Management requirements and ensures compliance for new and redevelopment projects, including use of the Portneuf Valley Stormwater Design Manual.

The Portneuf Valley Stormwater Design Manual, revised in 2016, establishes the stormwater design requirements used for all new development and applicable redevelopment projects in accordance with MS4 permit requirements. This manual's onsite retention requirements

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39. Through ordinance or other regulatory mechanism, each Permittee organization requires the installation and long-term maintenance of permanent stormwater controls at new development and redevelopment project sites that result from land disturbance greater than or equal to 1 acre and that discharges to the MS4. The required stormwater controls must be sufficient to retain onsite the runoff volume produced from a 24-hour 95th percentile storm event, and/or require runoff treatment sufficient to attain an equal or greater level of water quality benefit as this onsite retention standard. *Please cite to the ordinance containing the permanent stormwater control requirements. Y/N and link.*

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meet the Permit's requirements for onsite retention of the volume produced from a 24-hour 95th percentile storm (0.65"). The manual provides alternatives for local compliance (in compliance with Permit Part 3.4.2.2, as well as procedures for plan review and approval, consistent with Permit Part 3.3.4 and 3.4.4). This manual has been adopted by Pocatello and Chubbuck.

Bannock County – Bannock County monitors private stormwater assets for compliance with 17.52.540 (Stormwater runoff) and 15.18 (Illicit Discharge). Bannock County will adopt the current Portneuf Valley Stormwater Design Manual by ordinance.

ITD – As per applicable federal, state and local rules, codes and ordinances where the state roadway facility is located.

ISU – The Environmental Health and Safety Department will adopt an EHS Policy which will serve as the regulatory mechanism for post-construction site runoff. In addition, any incorporated references into service contracts will assist with compliance.

Intended Compliance Schedule

- **Bannock County**
 - Permit Year 3 (2022) – Develop post-construction private stormwater asset monitoring program and review and create ordinance adopting the current version of the Portneuf Valley Stormwater Design manual.
- **ISU**
 - Permit Year 4 (2023) – Adopt Portneuf Valley Stormwater Design Manual for post-construction site runoff.

3.4.3 Permanent Stormwater Controls Specifications

Pocatello/Chubbuck – The Portneuf Valley Stormwater Design Manual contains written specifications which address the design, installation, and maintenance of required permanent stormwater controls. The manual provides guidance on the use of site-based practices for local soils and topography. It addresses sizing and performance criteria, and provides design examples. It also provides specifications and guidance for operations and maintenance including self-inspection checklists. This manual has been adopted by Pocatello and Chubbuck.

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40. Each Permittee organization requires permanent storm water controls through written specifications. **Y/N**

Bannock County – [Bannock County Code 17.52.540 and 16.28.100](#) - Stormwater Runoff. This regulates the design of permanent stormwater facilities. Additionally, the Idaho Department of Environmental Quality catalog for construction BMPs provides stormwater control design guidelines for permanent stormwater controls. Bannock County plans to adopt the current Portneuf Valley Stormwater Design Manual.

ITD – 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.

ISU – ISU will adopt the Portneuf Valley Stormwater Design Manual.

Intended Compliance Schedule

- **ISU**
 - Permit Year 4 (2023) – Develop a factsheet for contractors by December 2022.
 - Permit Year 4 (2023) – Adopt PVSDM.
- **Bannock County**
 - Permit Year 3 (2022) – Develop post construction private stormwater asset design/monitoring program and review/create ordinance adopting the current version of the Portneuf Valley Stormwater Design manual.

3.4.4 Permanent Stormwater Controls Plan Review and Approval

Pocatello – The City reviews and approves pre-construction design plans to ensure compliance with the Portneuf Valley Stormwater Design Manual for new and redevelopment projects within City limits. The project's engineer is expected to conduct site inspections during and after construction to determine that the facility's stormwater structures have been constructed according to the approved plans and permits. Stamped record drawings must be submitted to the City once the project is complete.

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41. Each Permittee organization requires pre-construction site plan review and approval for permanent storm water controls at new development and redevelopment sites that result in land disturbance of one or more acres and discharge to the MS4.
Y/N

Chubbuck – The City reviews and approves construction plans to ensure compliance with the Portneuf Valley Stormwater Design Manual for new and redevelopment projects within City limits. City inspectors and the project's engineer are expected to conduct site inspections during and after construction to determine that the facility's stormwater structures have been constructed according to the approved plans and permits. Stamped record drawings must be submitted to the City once the project is complete.

Bannock County – The County reviews and approves construction plans to ensure compliance with the County's zoning and subdivision code for new and redevelopment projects within County boundaries. County inspectors and the project's engineer conduct site inspections during and after construction to determine that the facility's stormwater structures have been constructed according to the approved construction plans. Stamped record drawings are submitted to the County once the project is complete.

ITD – 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.

ISU – Personnel within Facilities Services will review post-construction design plans for conformance with the PVSDM.

Intended Compliance Schedule

- **ISU**
 - Permit Year 4 (2023) – Implement review of all post-construction plans for conformance with PVSDM.

- **Bannock County**
 - Permit Year 3 (2022) – Develop and implement post-construction plan review program in conformance with the current version of the Portneuf Valley Stormwater Design manual.

3.4.5 Permanent Stormwater Controls Inspection and Enforcement

Pocatello and Chubbuck – City-owned and private stormwater management facilities will be inspected and maintained as outlined in each City’s Stormwater O&M Manual. Currently, private facilities are inspected and maintained by their owners, with no City inspections. Currently each City is working towards inspecting all City-owned facilities. The Enforcement Response Policy is outlined in each City’s Code 8.52, and includes administrative enforcement, as well as civil remedies by constituting violations as misdemeanors and public nuisance.

Bannock County – County-owned stormwater management facilities will be inspected and maintained as outlined in the County Stormwater O&M Manual, once adopted. Currently, private facilities are inspected and maintained by their owners, with no County inspections. The County’s ERP will be included in its Post-Construction Ordinance.

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42. Each Permittee organization has identified high priority locations in the jurisdiction where the Permittee regularly inspects the installation, and long-term operation, of permanent stormwater controls. **Y/N**

43. Each Permittee organization has an enforcement strategy to ensure and maintain the functional integrity of permanent stormwater controls within this jurisdiction. **Y/N**

ITD – 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.

ISU – The Environmental Health and Safety Department will partner with the City of Pocatello for assistance with inspection of permanent stormwater controls.

Intended Compliance Schedule

- **Pocatello, Chubbuck and Bannock County**
 - Permit Year 2 (2021) – Adopt O&M Manual.
 - Permit Year 2-3 (2021-2022) – Develop an inspection program for private stormwater management facilities in accordance with the requirements of the MS4 Permit.
 - Permit Year 3 (2022) – Begin annual inspection of high priority locations.
- **Bannock County**
 - Permit Year 4 (2023) – Adopt Post Construction Ordinance with ERP.
- **ISU**
 - Permit Year 4 (2023) – Adopt City of Pocatello practices into service contracts.
 - Permit Year 3 (2022) – Adopt O&M Manual.

3.4.6 Operation and Maintenance of Permanent Stormwater Management Controls

Pocatello – The City uses a comprehensive database to inventory and track O&M activities on known public and private permanent stormwater facilities. The Portneuf Valley Stormwater Design Manual requires an Operation and Maintenance Agreement for private facilities. Pocatello will adopt a stormwater O&M Manual for maintenance of City facilities. The responsibility for operation and maintenance of private facilities resides with the property owner.

Chubbuck – The City uses a database to inventory and track O&M activities on known public permanent stormwater facilities. The Portneuf Valley Stormwater Design Manual requires an Operation and Maintenance Agreement for private facilities. City-maintained facilities will follow the BMPs in the City's Stormwater O&M Manual. The responsibility for operation and maintenance of private facilities resides with the property owner.

Bannock County – The operation and maintenance of public stormwater facilities within the MS4 are combined with the yearly county road maintenance program. Bannock County will adopt a stormwater O&M Manual for maintenance of County facilities.

ITD – 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.

ISU – The Environmental Health and Safety Department will ensure that any university owned facilities will follow the BMPs in the ISU O&M Manual.

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44. Each Permittee organization uses a database inventory to track and manage the operational condition of permanent stormwater controls within this jurisdiction. **Y/N**

45. Each Permittee organization requires enforceable and transferable O&M Agreements, where parties other than this Permittee organization are responsible for operation and maintenance of permanent storm water controls? **Y/N**

Intended Compliance Schedule

- **Pocatello, Chubbuck and Bannock County**
 - Permit Year 2 (2021) – Adopt O&M Manual for City facilities.
 - Permit Year 2-3 (2021-2022) – Develop private O&M Database.
- **ISU**
 - Permit Year 3 (2022) – Develop O&M database for ISU-maintained facilities, and adopt O&M Manual.
- **Bannock County**
 - Permit Year 4 (2023) – Adopt Post Construction Ordinance requiring O&M Agreements.

3.4.7 Permanent Stormwater Controls Training for Staff

Pocatello will provide an annual or biannual training for permittee staff, based on permittee staff priorities for post construction.

Pocatello – City staff will participate in on-going training related to the design, construction, operation and maintenance of stormwater facilities.

Chubbuck – City staff will participate in on-going training related to the design, construction, operation and maintenance of stormwater facilities.

ITD – ITD staff working within the MS4 area will participate in training hosted by the City of Pocatello related to the design, construction, operation and maintenance of stormwater facilities.

Bannock County – County Engineering staff keep up to date on information related to function and implementation of stormwater controls.

ISU – The Environmental Health and Safety Department will examine whether they can utilize the City of Pocatello's training or model training after the City of Pocatello.

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46. Each Permittee organization ensures that all persons responsible for reviewing site plans for permanent stormwater controls and/or for inspecting the installation and operation of permanent controls are trained to conduct such activities. **Y/N**

Intended Compliance Schedule

- **All permittees –**
 - Permit Year 2 (2021) – Begin tracking permanent stormwater control training.
- **Pocatello**
 - Permit Year 2 (2021) – Begin providing annual or every other year training for all applicable permittee staff.

Permit Part 3.5 Pollution Prevention/Good Housekeeping for MS4 Operations

To properly operate and maintain the MS4, and its facilities using prudent pollution prevention and good housekeeping, the Pocatello Urbanized Area Permittees 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, 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;
 - 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 (PPPs) for Permittee-owned facilities;
 - Work cooperatively with other entities to control litter on a regular basis; and
 - 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 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.

Responsible Persons

Pocatello – This work is primarily conducted by the Street Operations Department, with many other departments also involved, as will be outlined in Pocatello's O&M Manual. Science and Environment Division staff provide training support and review of municipal procedures. Science and Environment Division staff are also responsible for writing and updating Pocatello's O&M Manual, with input from the affected departments.

Chubbuck – The Streets and Sanitation Department primarily performs this work, with many other departments also involved. Pocatello's Science and Environment Division staff provide training support.

Bannock County – This work is primarily conducted by the Road and Bridge Department. County Engineering staff support efforts by the Road and Bridge.

ITD – 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.

ISU – This work is primarily conducted by the Facilities Services Grounds Department with support from other ISU Departments.

3.5.2 Inspection and Cleaning of Catch basins and Inlets

Pocatello – The schedule for inspecting and maintaining catch basins will be outlined in the O&M Manual, including the rational for targeting certain areas.

Chubbuck – The schedule for inspecting and maintaining catch basins will be outlined in the O&M Manual, including the rational for targeting certain areas.

Bannock County – There are no identified stormwater catch basins within the MS4 in Bannock County.

ITD – 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 the ITD Operations Manual, ITD BMP Manual, and current engineering standards.

ISU – The schedule for inspecting and maintaining catch basins will be outlined in the O&M Manual.

Intended Compliance Schedule

- **Pocatello, Chubbuck and ISU**
 - Permit Year 2 (2021) – Adopt Stormwater O&M Manual.

Annual Report Good Housekeeping

47. Each Permittee organization inspects all MS4 catch basins and inlets in the jurisdiction at least once every five years and takes appropriate maintenance or cleaning action based on those inspections. **Y/N and # Inspected**

3.5.3 Operation and Maintenance Procedures for Streets, Roads, Highways, and Parking Lots

Pocatello – Pocatello operates its streets and parking lots in a manner that protects water quality and reduces the discharge of pollutants through the MS4. The schedule for sweeping streets and parking lots is described in Section 3.5.5. The locations and operation of snow disposal areas, the BMPs for de-icing/anti-icing, the location of sand/salt storage areas, and the schedule and BMPs for O&M of associated stormwater facilities will be outlined in the O&M Manual.

Chubbuck – The schedule for sweeping streets and parking lots is described in Section 3.5.5. The locations and operation of snow disposal areas, the BMPs for de-icing/anti-icing, the location of sand/salt storage areas, and the schedule and BMPs for O&M of associated stormwater facilities will be outlined in the O&M Manual.

Bannock County – Operation and maintenance procedures for County roads, highways, and parking lots are provided by the Bannock County Road and Bridge Department. This effort is scheduled and tracked through the PubWorks database system. The locations and operation of snow disposal areas, the BMPs for de-icing/anti-icing, the location of sand/salt storage areas, and the schedule and BMPs for O&M of associated stormwater facilities will be outlined in the O&M Manual.

ITD – The operation and maintenance of streets, roads, highways and parking lots within the MS4 area are achieved as per state-local agreement and in accordance with the ITD Operations Manual, ITD BMP Manual, and current engineering standards.

ISU – ISU will maintain information on street and parking lot sweeping, snow dispersal areas and sand/salt storage in the O&M Manual.

Intended Compliance Schedule

- **Pocatello, Chubbuck, Bannock County, and ISU –**
 - Permit Year 2 (2021) – Adopt Stormwater O&M Manual.

Annual Report Good Housekeeping

48. Each Permittee organization operates and maintains Streets, Roads, Highways and/or Parking Lots in its jurisdiction in a manner that protects water quality and reduces the discharge of pollutants through the MS4. **Y/N**

3.5.4 Inventory and Management of Street/Road Maintenance Materials

All street/road material storage locations within the MS4 are listed below. Several of the permittees material storage locations are outside of the MS4 area. The SWPPPs for each of the locations below will be posted at <https://stormwater.pocatello.us>

Annual Report Good Housekeeping

49. Each Permittee organization operates all street/road maintenance material storage locations in a manner that prevents pollutants in stormwater runoff from discharging to the MS4 or into any receiving waterbody. A description of each Material Storage Location is included in the SWMP Document as required by Permit Part 3.5.4. **Y/N**

Storage Facility	Estimated Annual Quantity of Materials	Material Use (how/where)	Structural and non-structural controls
Pocatello – 1st Ave Sand & Salt Shed (closed at end of 2020)	0 tons beginning in 2021; Previously 1000 tons sand; 500 tons salt	Sand/salt for winter maintenance	Covering and berms
ISU – 1st Ave Salt Shed (beginning 2021)		Sand/salt for winter maintenance	Covering and berms
ISU – Facilities		Mulch and dirt	Berms
Chubbuck - City Maintenance Yard	300 tons of sand, 150 tons of salt	Sand/salt for winter maintenance	Covering and berms

Intended Compliance Schedule

- **Pocatello**
 - Permit Year 2-4 (2021-2023) – Update list of applicable street/road maintenance material storage locations. Write SWPPPs for any added locations.
- **ISU**
 - Permit Year 3 (2022) – Write SWPPPs; Complete location list.
- **Chubbuck**
 - Permit Year 3 (2022) – Update list of applicable street/road maintenance materials. Write SWPPP for City Maintenance Yard.

3.5.5 Street Road, Highway, and Parking Lot Sweeping

3.5.5 Street Road, Highway, and Parking Lot Sweeping

Pocatello – Pocatello has a robust street sweeping program that includes sweeping all streets that discharge to the MS4 at least annually. The street sweeping management plan will be included in the Stormwater O&M Manual. This includes a map of all streets that discharge to the MS4 and their general street sweeping frequency, a discussion of areas where sweeping is technically infeasible (and what alternative BMPs are utilized, including public outreach), a description of all street sweeping activities including types of sweepers used, lane miles swept, and weight of materials collected.

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50. Each Permittee organization sweeps all areas of the jurisdiction that discharge to the MS4 at least once annually. A description of the street sweeping program, as required by Permit Part 3.5.5, is included in the SWMP Document. **Y/N**

Chubbuck – The street sweeping management plan will be included in the Stormwater O&M Manual. 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.

Bannock County – County road sweeping is conducted by the Bannock Road and Bridge Department. It will follow the Street Sweeping Management Plan in the Stormwater O&M Manual. This includes a map of all streets that discharge to the MS4 and a description of all street sweeping activities which includes lane miles swept, general schedule by sweeping frequency, dumping locations, and weight of materials collected.

ITD – 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.

ISU – ISU's Street Sweeping Management Plan will be included in the Stormwater O&M Manual.

Intended Compliance Schedule

- **Pocatello, Chubbuck, ISU and Bannock County**
 - Permit Year 2 (2021) – Adopt Stormwater O&M Manual.
- **ITD**
 - Permit Year 2 (2021) – Update SWMP or permittee website with sweeping management plan.

3.5.6 O&M Procedures for Other Municipal Areas and Activities

Pocatello – Pocatello’s O&M activities are conducted in a manner that protects water quality and reduces the discharge of pollutants through the MS4. Procedures and BMPs for other municipal areas and activities will be outlined in the O&M Manual.

Chubbuck – Procedures and BMPs for other municipal areas and activities will be outlined in the O&M Manual.

Bannock County – Procedures and BMPs for other municipal areas and activities will be outlined in the O&M Manual.

ITD – The operation and maintenance of other areas and activities within the MS4 area are achieved as per state-local agreement and in accordance with the ITD Operations Manual, ITD BMP Manual, and current engineering standards.

ISU – Procedures and BMPs for other areas will be included in the O&M Manual.

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51. Each Permittee organization has reviewed its operation and maintenance activities for the types of activities listed below and confirms that all such activities are conducted in a manner that protects water quality and reduces the discharge of pollutants through the MS4. *Municipal Activities to be addressed include - grounds/park and open space maintenance operations; fleet maintenance and vehicle washing operations; building maintenance; snow disposal site operation and maintenance; solid waste transfer activities; municipal golf course maintenance; materials storage; hazardous materials storage; used oil recycling; and spill control and prevention measures for municipal refueling facilities.* **Y/N**

Intended Compliance Schedule

- **Pocatello, Chubbuck, ISU, and Bannock County**
 - Permit Year 2 (2021) – Adopt Stormwater O&M Manual.

3.5.7 Requirements for Pesticide, Herbicide, and Fertilizer Applications

Pocatello – The City’s O&M programs for its parks and other facilities work to minimize potential pollution from pesticide, herbicide and fertilizer applications. At least one employee maintains an Idaho Professional Applicator’s License from the Idaho Department of Agriculture. Requirements and BMPs for pesticide, herbicide and fertilizer applications will be described in the O&M Manual.

Chubbuck – The City’s O&M programs for its parks and other facilities work to minimize potential pollution from pesticide, herbicide and fertilizer applications. Most of these lands are maintained by either the Department of Parks and Recreation or the Streets and Sanitation Department. Staff members obtain certification from the Idaho Department of Agriculture to work as commercial applicators. Requirements and BMPs for pesticide, herbicide and fertilizer applications are described in the O&M Manual.

Annual Report Good Housekeeping

52. Each Permittee organization ensures appropriate practices to reduce the discharge of pollutants to the MS4 associated with the application, storage and disposal of pesticides, herbicides and fertilizers. All employees or contractors applying pesticides, etc. are instructed to follow all label requirements, including those regarding application methods, rates, number of applications allowed, and disposal of the pesticide/herbicide/fertilizer and rinsate. **Y/N**

Bannock County – The Bannock County Noxious Weed Department follows the current State of Idaho regulations. Herbicide and pesticide applicators maintain their certification through the Idaho Department of Agriculture as commercial applicators.

ITD – 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.

ISU – The Facilities Services Grounds Department has adopted an Integrated Pest Management Plan. Herbicide and pesticide applicators maintain their certification through the Idaho Department of Agriculture as commercial applicators.

Intended Compliance Schedule

- **Pocatello, Chubbuck, ISU, and Bannock County**
 - Permit Year 2 (2021) – Adopt Stormwater O&M Manual.

3.5.8 Stormwater Pollution Prevention Plans (SWPPPs) for Permittee Facilities

Pocatello – Stormwater Pollution Prevention Plans (SWPPPs) will be developed for all City-owned material storage facilities, heavy equipment storage areas, and maintenance yards identified in the inventory required by Part 3.2.2 (MS4 Map and Outfall Inventory), that have the ability to discharge to the City-owned MS4. A list of these facilities will be included in the O&M Manual.

Chubbuck – Stormwater Pollution Prevention Plans (SWPPPs) will be developed for all City-owned material storage facilities, heavy equipment storage areas, and maintenance yards identified in the inventory required by Part 3.2.2 (MS4 Map and Outfall Inventory), that have the ability to discharge to the City-owned MS4. A list of these facilities will be included in the O&M Manual.

Bannock County – Bannock County does not have material storage facilities, maintenance yards or equipment storage areas within the MS4.

ITD – ITD does not have any material storage facilities, maintenance yards or equipment storage areas within the MS4. While the ITD District 5 facilities on S. 5th do not drain to the Portneuf River watershed, they are managed in accordance to pollution prevention best practices as per ITD Operations Manual and any applicable federal, state and local requirements.

ISU – Stormwater Pollution Prevention Plans (SWPPPs) will be developed for all ISU owned material storage facilities, heavy equipment storage areas and maintenance areas. A list of these facilities will be available in the Stormwater O&M Manual.

Annual Report Good Housekeeping

53. Each Permittee organization uses site specific Storm Water Pollution Prevention Plans for all Permittee-owned material storage facilities, heavy equipment storage areas, and maintenance yards located in the Permit Area. **Y/N**

Intended Compliance Schedule

- **Pocatello, Chubbuck & ISU**
 - Permit Year 2 (2021) – Write SWPPPs for applicable facilities and include in Stormwater O&M Manual.

3.5.9 Litter Control

Pocatello – The City implements an effective litter control and recycling program across the City. BMPs for litter control at City facilities and on City streets will be outlined in the O&M Manual. Local ordinances prohibit littering and establish requirements for the City's solid waste program. Additionally, the City facilitates volunteer litter cleanup along City streets each spring and along the Portneuf River at the end of summer during low-water. Free dumpsters are also provided to residents on a limited basis to encourage residential yard cleanup.

Chubbuck – BMPs for litter control at City facilities and on City streets will be outlined in the O&M Manual. Local ordinances prohibit littering and establish requirements for the City's solid waste program. Additionally, the City facilitates volunteer property and litter cleanup each spring. Free dumpsters are also provided to residents on a limited basis to encourage residential yard cleanup, and to code enforcement to help manage nuisance properties.

Bannock County – [Bannock County Code 8.08](#) – [Solid Waste Collection and Disposal](#) establishes sanitary standards for the unincorporated areas in Bannock County. Bannock County operates both the landfill at Fort Hall Mine Road and the McCammon Transfer Station. The County maintains BMPs for litter control at County facilities.

ITD – ITD complies with applicable federal, state and local requirements, the ITD Operations Manual, and ITD BMP Manual on litter control. ITD District 5 yard and offices contract with the City of Pocatello Sanitation Department for garbage disposal and recycling services.

ISU – ISU implements an effective litter control and recycling program across campus. BMPs for litter control are outlined in the O&M Manual. Additionally, ISU volunteers clean up litter across campus through student service projects.

Intended Compliance Schedule

- **Pocatello, Chubbuck, ISU, and Bannock County**
 - Permit Year 2 (2021) – Adopt Stormwater O&M Manual.

3.5.10 Stormwater Pollution Prevention/Good Housekeeping Training for Staff

The City of Pocatello provides all permittees with web-based training materials for new and existing staff.

Pocatello – Pollution prevention training for City employees has been incorporated into the City's online training management system to enhance the effective delivery of this training. New and existing employees in positions where this training is applicable will require initial and follow up training. Where applicable, online training can be supplemented with customized in-person training to meet the needs of specific departments or work groups.

Chubbuck – New and existing employees in positions where this training is applicable will require initial and follow up training. Where applicable, online training can be supplemented with customized in-person training to meet the needs of specific departments or work groups.

Bannock County – Bannock County will incorporate web-based training materials provided by the City of Pocatello for new and existing staff.

ITD – 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.

ISU – New and existing employees in positions where this training is applicable will require initial and follow-up training. Where applicable, online training can be supplemented with customized in-person training to meet the needs of specific departments or work groups.

Intended Compliance Schedule

- **Pocatello, Chubbuck, ISU and Bannock County**
 - Permit Year 2 (2021) – Incorporate pollution prevention training into onboarding training for applicable new employees.

Annual Report Good Housekeeping

54. Each Permittee organization ensures that all persons responsible for municipal operations and maintenance activities are trained to conduct such activities. **Y/N**

Annual Report Good Housekeeping

Comments. Use this Comments field as necessary to explain any unique implementation schedules, summarize inspections, actions, etc. that were conducted during the relevant reporting period. **Summarize**

C.SPECIAL CONDITIONS FOR DISCHARGES TO IMPAIRED WATERS/MONITORING/ EXCURSIONS ABOVE IDAHO WQS (Permit Parts 4, 5 & 6)

The following sections describe the Permittees' quantitative monitoring/assessment and pollutant-reduction activities designed to assess and control pollutants of concern in MS4 discharges to the Portneuf River, as required by Permit Parts 4, 5 & 6.

Permit Part 4.2 Monitoring of MS4 Discharges to Impaired Waters

The Permittees must submit a Monitoring/Assessment Plan that is designed to quantify, at a minimum, pollutant loadings from the MS4 into the Portneuf River for sedimentation/siltation. This plan must address all required elements outlined in Permit Part 6.2.

The City of Pocatello, on behalf of all permittees, has contracted with Idaho State University to implement the monitoring plan. This includes monitoring stormwater turbidity and suspended sediment loads as well as the effects of two stormwater treatment wetlands on those loads.

Annual Report Impaired Waters
*Pocatello on behalf of
permittees.*

55. Provide a current status report regarding the development of any required Monitoring/Assessment Plan and implementation of pollutant reduction activities as required by Permit Part 4. **Status Report**

Monitoring locations were selected to enable monitoring of stormwater sediment loads from three major drainages, quantitatively monitor sediment retention by the two major stormwater wetlands, and on Pocatello Creek, partition loads between urban stormwater sources, agricultural return flow and sources from upstream of the urban area.

Presence/absence loggers will also be installed at 10 locations to determine when upland drainages are contributing to flow and help identify sources of sediment in the urban area. A combination of presence/absence loggers as well as turbidity and conductivity loggers will be installed near the inlet and outlet of each stormwater pond to assess sediment retention of these ponds. At all locations measuring turbidity, discharge will be indirectly measured simultaneously. See the Monitoring/Assessment Plan for more details – <https://www.pocatello.us/443/Storm-Water-Permit>.

This monitoring/assessment plan was submitted to the EPA in June 2020. Other than cooperating landowners and watershed partners, 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. Instruments are scheduled to be installed in the summer 2020 through spring 2021.

Data will be analyzed annually for trends, with a summary in each Annual Report beginning in 2021. The Final Monitoring Report will contain assessments of stormwater treatment facilities (wetlands), including the volume of sediment removal, recommendations for maintenance frequency, and analysis of spatiotemporal trends between sites. 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.

Permit Part 4.3 Pollutant Reduction Activities

The Pocatello Urbanized Area must define and implement two activities designed to reduce sediment, nitrogen, phosphorus, oil & grease, dissolved oxygen, bacteria, and/or temperature loadings from the MS4 into the Portneuf River.

Intended Compliance Schedule

- **Pocatello**
 - Permit Year 2 (2021) – Develop and submit proposed pollutant reduction activities to EPA.

Permit Part 5 Response to Excursions above Idaho Water Quality Standards

Annual Report Excursions Above Idaho Water Quality Standards *Pocatello on behalf of permittees.*

56. During this or any prior reporting period, did the Permittee submit written notification to EPA and IDEQ regarding MS4 discharge that are causing or contributing to an excursion above the WQS as directed by Permit Part 5.1? **Y/N**

57. During this or any prior reporting period, did the Permittee submit an Adaptive Management Report to EPA and IDEQ, as directed by Permit Part 5.2? **Y/N**

58. Provide a summary of the Permittee's efforts to date that address the MS4 discharges contributing to the original water quality excursion, including the results of any monitoring, assessment, or evaluation efforts conducted during the reporting period. **Summarize**

Annual Report Attachments

56. List any attachments submitted as part of this Annual Report. **List**

**INTERGOVERNMENTAL AGREEMENT
FOR ROLES AND RESPONSIBILITIES UNDER THE NPDES
MUNICIPAL SEPARATE STORM WATER PERMIT (Permit # IDS028053)**

This Intergovernmental Agreement entered into this 20 day of May 2020, by and between the City of Pocatello (Pocatello), the City of Chubbuck (Chubbuck), the Idaho Transportation Department, District 5 (ITD), Bannock County (County), and Idaho State University (ISU), collectively the "Permittees", is made for the purpose of complying with the federal National Pollutant Discharge Elimination System Municipal Stormwater Permit ("NPDES Permit").

RECITALS

WHEREAS, Congress in 1987 amended Section 402 of the Federal Clean Water Act (33 U.S.C.A. section 1342 (p)) to require the Federal Environmental Protection Agency (EPA) to promulgate regulations ("the regulations") for applications for permits for storm water discharges; and

WHEREAS, the regulations are designed to control pollutants associated with storm water discharges through the use of the NPDES permit system which allows the lawful discharge of storm water into waters of the United States; and

WHEREAS, the regulations are designed to require NPDES permits for discharges from small Municipal Separate Storm Sewer Systems (MS4s) from a system-wide or jurisdiction wide basis; and

WHEREAS, the Permittees have received a NPDES Permit, effective October 2019; and

WHEREAS, the NPDES Permit requires that the Permittees maintain an intergovernmental agreement describing each organization's respective roles and responsibilities related to this permit. Any previously signed agreement may be updated, as necessary, in accordance with this permit.

NOW THEREFORE the Parties agree as follows:

AGREEMENT

1. PURPOSE OF AGREEMENT

The purpose of this agreement is to detail the duties, roles and responsibilities to be provided by the Permittees with respect to compliance with the regulations, requirements and commitments set forth in the NPDES Permit issued by EPA.

As per Section 2.5 in the NPDES Permit:

"Each Permittee is individually responsible for Permit compliance related only to portions of the MS4 owned or operated solely by that Permittee, or where this Permit requires a specific Permittee to take an action. The Permittees must work together under a joint agreement established pursuant to this Permit. Each Permittee is jointly responsible for Permit

compliance:

- A. Related to portions of the MS4 where operational or storm water management program (SWMP) implementation authority has been transferred from one Permittee to another, in accordance with the written and enforceable agreement between the Permittees as described in this Part;
- B. Related to portions of the MS4 where Permittees jointly own or operate a portion of the MS4;
- C. Related to the submission of reports or other documents required by Parts 3 and 5 of this Permit; and
- D. Where this Permit requires action and a specific Permittee is not named."

2. GENERAL PROVISIONS

- A. The City of Pocatello, the City of Chubbuck, the Idaho Transportation Department District 5, Bannock County, and Idaho State University are co-permittees in the NPDES Permit as provided in 40 CFR 122.33(b) (iii).
- B. Each Permittee will be responsible for complying with any NPDES Permit conditions relating to discharges from those parts of the MS4 that it continues to operate and maintain.
- C. The Permittees will utilize available monitoring and enforcement mechanisms, in full cooperation with other Permittees, to control the contribution of pollutants from one MS4 to another.
- D. Each party to this Agreement shall assign at least one representative to the Permittee group, which shall meet at least annually to assess and define necessary work tasks to comply with the terms and conditions of this Agreement and the issued permit. Additional meetings will be held based on the needs of the group.

3. STORM WATER PERMIT PROGRAM ROLES AND RESPONSIBILITIES

A. Program Administration and Management

Pocatello shall be the lead agency for Program Administration and Management. Program Administration and Management consists primarily of:

- i. Preparing the agenda, minutes, and other documents related to the regular and special meetings of the Permittees;
- ii. Compiling the material from the Permittees for the filing of the Stormwater Management Plan (SWMP) and other required NPDES Permit documents to the EPA and/or Idaho DEQ;
- iii. Commenting on proposed regulations that may impact permit implementation.
- iv. Coordinating the development of template manuals and other documents for permittee use; and

v. Coordinating various Permittee activities under the NPDES Permit.

The Permittees agree to cooperate with Pocatello in areas of administration, including regular attendance and participation in Permittee meetings, participation in the permit negotiations process as needed and timely submittal of data to Pocatello, upon request, for preparation of the Stormwater Management Plan and other required documents.

The Permittees shall reimburse Pocatello for their share of the Program Administration costs as set forth in Section 4 of this agreement.

B. Monitoring Program

Pocatello shall be the lead agency for the Monitoring Program. The Monitoring Program consists primarily of:

- a) Developing and implementing the monitoring program as described in the NPDES Permit, including the monitoring protocol, testing, and other activities;

The Permittees shall reimburse Pocatello for their share of the Monitoring Program costs as set forth in Section 4 of this agreement.

C. Public Outreach and Training Program

Pocatello shall be the lead agency for the Public Outreach Program. The Public Outreach Program consists primarily of:

- a) Developing and implementing the public outreach program as described in the NPDES permit;
- b) Developing and implementing the training programs as described in the NPDES permit; and
- c) Assessing outreach and training effectiveness towards any desired behavior change.

The Permittees shall reimburse Pocatello for their share of the Public Outreach and Training Program costs as set forth in Section 4 of this agreement.

4. APPORTIONMENT OF COSTS

A. Cost Share

1. Permittees shall reimburse Pocatello for their share of the Program Administration, Outreach/Training, and Monitoring costs based on their percentage of costs related to conduct of the Program elements as described in Sections 1-3 above.
2. Cost share portions for each of the Permittees was developed using an average cost based 50% on area and 50% on population, modified by the ITD and ISU contribution.

a) Area Calculation (acres)

Pocatello	11,176	=67%
Chubbuck	977	= 6%
Bannock County	2,935	=18%
ITD	813	= 5%
ISU	611	= 4%

Total Area of Pocatello Urbanized Area= 16,512 acres

b) Population Calculation (# people, per 2010 census)

Pocatello	54,255	= 75%
Chubbuck	13,922	= 19%
Bannock County	4,358	= 6%
ITD	----	
ISU	----	

Total PUA = 72,535 people

c) Annual Cost Apportionment (50% area; 50% population)

Pocatello:	74%
Chubbuck:	13.5%
County:	12.5%
ISU:	flat fee of \$6600
ITD:	flat fee of \$6600

B. Timely Payments

All amounts due and owing the City of Pocatello for the costs of Program Administration, Monitoring, Public Outreach/Training and other agreed upon expenses shall be paid within 60 days of invoicing.

C. Budgeting

The City of Pocatello shall present a budget for the following Permit Year (October –September) to the Permittees each January for consideration. The Permittees shall consider such budget, provide comment, and the budget shall be approved at a subsequent Permittee meeting held in March of each Permit Year, upon motion and approval by a majority of the Permittees present.

Throughout the Permit Year, modifications to categories within the approved budget shall be shared with the co-permittees on a semi-annual basis, at a minimum. No overall increase in the budget shall be authorized unless approved by the majority of the Permittees, and each Permittee has budget authority for such revisions.

5. TERMINATION AND MODIFICATION

Each Permittee shall have the right to withdraw from and terminate its responsibilities under this Agreement at any time by serving upon all other Permittees 30-days advance written notice of withdrawal. Any Permittee withdrawing from this Agreement shall pay its proportionate share of any work performed pursuant to this Agreement up to the effective date of its withdrawal. Withdrawal from this Agreement is subject to the conditions of the NPDES Permit.

Should any party to this Agreement be determined by EPA not to be an operator of an MS4 requiring participation in a MS4 Phase II Storm Water Permit that party shall be allowed to immediately withdraw from this Agreement at no cost beyond those costs billed to the date of withdrawal. This Agreement may be modified in writing if executed by all Permittees and approved by EPA.

6. NOTICES

Any notices which the party may desire to serve upon the other Permittees shall be in writing and shall be deemed served when delivered personally or when deposited in the United States mail with adequate postage to the following addresses:

City of Pocatello

Science & Environment Administrator
P.O. Box 4169
Pocatello, ID 83205-4169

City of Chubbuck

City Engineer
PO Box 5604
Chubbuck, ID 83202

Bannock County

County Engineer
5500 S. 5th Ave.
Pocatello, ID 83201

Idaho Department of Transportation, District 5

Environmental Planner
5151 S. 5th Ave.
Pocatello, ID 83204-2202

Idaho State University

Environmental Manager
921 S. 8th Avenue, STOP 8042
Pocatello, ID 83209-8042

7. INDEMNIFICATION/HOLDHARMLESS PROVISIONS

The City of Pocatello agrees to defend, indemnify, and hold harmless the City of Chubbuck, Bannock County, the Idaho Transportation Department and Idaho State University, their officers, governing board, agents and employees, from any and all claims for loss or damage to property or injury or death to persons, including costs, expenses and reasonable attorney's fees, arising from the negligence or wrongful acts or omissions of the City of Pocatello, its officers, employees, or agents. The City of Pocatello shall be liable under the provisions of this paragraph for such obligations, costs and expenses only to the extent that such act or omission is caused by the City or any of its officers, employees, or agents, and to the extent permitted by State law, including specifically, the limits set forth in the Idaho Tort Claims Act, and not by the City of Chubbuck, Bannock County, the Idaho Transportation Department, Idaho State University, or any of their officers, agents, or employees.

The City of Chubbuck agrees to defend, indemnify, and hold harmless the City of Pocatello, Bannock County, the Idaho Transportation Department, and Idaho State University, their officers, governing board, agents and employees, from any and all claims for loss or damage to property or injury or death to persons, including costs, expenses and reasonable attorney's fees, arising from the negligence or wrongful acts or omissions of the City of Chubbuck, its officers, employees, or agents. The City of Chubbuck shall be liable under the provisions of this paragraph for such obligations, costs and expenses only to the extent that such act or omission is caused by the City or any of its officers, employees, or agents, and to the extent permitted by State law, including specifically, the limits set forth in the Idaho Tort Claims Act, and not by the City of Pocatello, Bannock County, the Idaho Transportation Department, Idaho State University, or any of their officers, agents, or employees.

Bannock County agrees to defend, indemnify, and hold harmless the City of Pocatello, the City of Chubbuck, the Idaho Transportation Department and Idaho State University, their officers, governing board, agents and employees, from any and all claims for loss or damage to property or injury or death to persons, including costs, expenses and reasonable attorney's fees, arising from the negligence or wrongful acts or omissions of Bannock County, its officers, employees, or agents. Bannock County shall be liable under the provisions of this paragraph for such obligations, costs and expenses only to the extent that such act or omission is caused by the County or any of its officers, employees, or agents, and to the extent permitted by State law, including specifically, the limits set forth in the Idaho Tort Claims Act, and not by the City of Pocatello, City of Chubbuck, the Idaho Transportation Department, Idaho State University, or any of their officers, agents, or employees.

The Idaho Transportation Department agrees to defend, indemnify, and hold harmless the City of Pocatello, City of Chubbuck, Bannock County, and Idaho State University, their officers, governing board, agents and employees, from any and all claims for loss or damage to property or injury or death to persons, including costs, expenses and reasonable attorney's fees, arising from the negligence or wrongful acts or omissions of the Department, its officers, employees, or agents. The Department shall be liable under the provisions of this paragraph for such obligations, costs and expenses only to the extent that such act or omission is caused by the Department or any of its officers, employees, or agents, and to the extent permitted

by State law, including specifically, the limits set forth in the Idaho Tort Claims Act, and not by the City of Pocatello, City of Chubbuck, Bannock County, Idaho State University, or any of their officers, agents, or employees.

Idaho State University agrees to defend, indemnify, and hold harmless the City of Pocatello, City of Chubbuck, Bannock County, and the Idaho Transportation Department, their officers, governing board, agents and employees, from any and all claims for loss or damage to property or injury or death to persons, including costs, expenses and reasonable attorney's fees, arising from the negligence or wrongful acts or omissions of the University, its officers, employees, or agents. The University shall be liable under the provisions of this paragraph for such obligations, costs and expenses only to the extent that such act or omission is caused by the University or any of its officers, employees, or agents, and to the extent permitted by State law, including specifically, the limits set forth in the Idaho Tort Claims Act, and not by the City of Pocatello, City of Chubbuck, Bannock County, the Idaho Transportation Department, or any of their officers, agents, or employees.

8. ENTIRE AGREEMENT

Except as provided otherwise herein, this instrument and any attachments hereto constitute the entire Agreement between the parties concerning the subject matter hereof.

IN WITNESS WHEREOF, the parties hereto have caused this Agreement to be duly executed as of the day and year first written above.

CITY OF POCATELLO



Brian C. Blad, Mayor

CITY OF CHUBBUCK

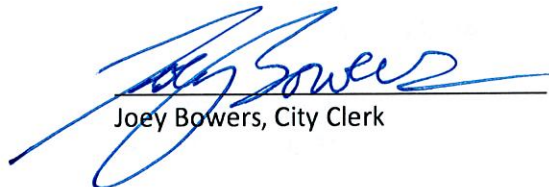


Kevin England, Mayor

ATTESTED TO BY:



Ruth Newsom, City Clerk




Joey Bowers, City Clerk

IDAHO STATE UNIVERSITY



Dr. Glen Nelson, VP Finance & Business Affairs

**BANNOCK COUNTY BOARD OF
COMMISSIONERS**



Steven Brown, Chairman 5/5/2020

IDAHO TRANSPORTATION DEPARTMENT, DISTRICT 5



Todd Hubbard, District Engineer