Stormwater Management Program

Written description as required by NPDES Permit Joint Permit #IDS028070

City of Idaho Falls / 380 Constitution Way, Idaho Falls, ID. 83405

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Contents

ACRONYMS

BMP	Best Management Practice
CGP	Construction General Permit
CWA	Clean Water Act
ESCP	Erosion and Sediment Control Plan
HHW	Household Hazardous Waste HQ Headquarters
IDEQ	Idaho Department of Environmental Quality
ITD	Idaho Transportation Department, District 6
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
SWMP	Stormwater Management Program
SWPP	Stormwater Pollution Prevention Plan
WOTUS	Waters of the United States WQS Water Quality Standard

1 Basic SWMP Information

This Storm Water Management Program (SWMP) Document was developed jointly by the City of Idaho Fall and the Idaho Transportation Department District 6 to describe the activities and control measures conducted to meet the terms and conditions of NPDES Permit #IDS028070.

1.1 Staff Organization

Shared Implementation

This Municipal Separate Storm Sewer System (MS4) is owned and operated by the City of Idaho Falls and the Idaho Transportation Department District 6 (ITD). 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 shared responsibilities (monitoring, administration, and public education) and individual agency cost share support for each of these obligations.

The updated Intergovernmental Agreement (available at Stormwater | Idaho Falls, ID (idahofallsidaho.gov) identifies the City of Idaho Falls as the lead for administration and monitoring requirements, as well as the lead for public involvement, outreach,
and education.

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1.2 Receiving Waters

The waterbodies discharging from the MS4 permit area are identified in Table 1.

Table 1 Receiving Water Summary

Receiving Waterbody Segments	WQS Classification	Impairment/Pollutant of Concern	TMDLs? (Yes/No)	Applicable WLAs (Yes/No)	No. of Discharging Outfalls
South Fork Willow Creek; Perennial Stream ID17040201SK001_05	Not Assessed	N/A	No	No	48
Snake River; Dry Bed Creek to river mile 791 ID17040201SK001_04	Not Assessed	N/A	No	No	120
Crow Creek*; Perennial Stream ID17040206SK022_02*	Not Supporting*	Phosphorus (Total) * Sedimentation/Siltation*	No *	No*	1
North Fork Willow Creek; Perennial Stream ID17040201SK003_05	Not Assessed	N/A	No	No	9
Progressive Canal	Not Assessed	N/A	No	No	2

- Crow Creek is listed in on the DEQ storm water site as a TMDL for Phosphorus and Sediment for that ties into the assessment reach form River Mile 791 (South of 65th South) and American Falls (further downstream on the snake river, however the reach of Crow Creek within this MS4 is a discharge point to the Snake River approximately 4.54 miles north of the impaired water body extent on the IDEQ Stormwater map. This was reviewed and deemed to be not geographically relevant as the portion of the Snake River where the Crow Creek discharges to the Snake River is not Assessed and doesn't have the applicable TMDL or WLA. Crow Creek was evaluated by DEQ in 2005. The stream was Dry to verify that the stream is subject to stormwater and snowmelt only and not active ongoing irrigation or natural water features.

Stormwater Asset Summary

Each permittee owns and maintains stormwater assets within the MS4 and in adjacent areas that do not drain to the MS4 or Waters of the United States (WOTUS). Within the MS4, the City of Idaho Falls has the largest number of stormwater assets, including piped conveyances and numerous detention ponds, dry wells for capturing and infiltrating stormwater, many of which are outside of the MS4. ITD also owns and maintains numerous culverts crossing Interstate 15 and Highway 20 in the MS4. The majority of the outfall discharges convey stormwater form both permittees, however there are instances where ITD and the City of Idaho Falls each have isolated discharges for their respective assets within the MS4 area.

MS4 Boundary

The City of Idaho Falls is larger than the MS4 permit area. The MS4 boundary is based on the extent of the permittees' MS4 system within the City of Idaho Falls that drains to WOTUS (see MS4 map). Areas shaded green on the map are within the MS4 boundary. All remaining portions of the City of Idaho Falls

stormwater infiltrates into the ground with no MS4/WOTUS connection. There are no integrated MS4's within this permit area.

1.3 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.

The SWMP is available at: Stormwater | Idaho Falls, ID (idahofallsidaho.gov)

Information tracked for program success include:

Street Sweeping

One of the integral parts of annual street maintenance involves sweeping of debris before the deposits can enter the storm system. Annual training is conducted by the Street Department to ensure that staff understands the most efficient means of removing debris from the streets and understands the value in keeping this material out of our storm systems.

Outfall inspections

The City inspects every outfall under this permit throughout the year. When outfall inspections show water flowing during dry weather flows, the flows are tracked to the source and corrected. All flows during dry weather are deemed illicit discharges. Municipal employees have been trained to be aware of illicit discharges if they are noticed in the field.

Water Wasting Orders/responses received

The City has also established a mechanism for the public to report illicit discharges. The public notifies the Sewer Department who then responds to a discharge and determines the source and correction. The Sewer Department will keep record of the discharge through paper filings. Water wasting orders, showing the frequency of discharges, are tracked and presented in the annual report.

PUBLIC EDUCATION AND OUTREACH

a. The City will maintain a water conservation flyer which is posted on the City website.

The City will mail the flyer dealing with storm water in utility billings entitled "When It Storms." This flyer provides information in regards to storm water pollution. The flyer was reviewed and approved by the local Idaho Department of Environmental Quality office. Mailings reach every address within the City of Idaho Falls that receives a water, sewer, garbage or electrical bill.

The City will participate in the Household Hazardous Waste Collection Program with the Idaho Department of Environmental Quality (IDEQ), Bonneville County and the City of Ammon. This program informs residents what household hazardous waste is and established a disposal guide for a variety of

hazardous wastes. The program also discussed why proper disposal is necessary and what individuals could do to create less hazardous waste.

The City will participate in the annual Idaho Falls Water Festival held in May of each year which involved educating 5th and 6th graders in the area about the importance of clean water in conjunction with Water Awareness Week. Representatives of the Water Department and Sewer Department will conduct presentations.

These efforts are represented on our website:

http://www.eieea.org/waterfestival/

b. The City will maintain a storm water educational webpage which can be viewed at: https://www.idahofallsidaho.gov/370/Stormwater

c. The City and ITD will provided relevant and appropriate storm water management education and training for staff that hold positions responsible for maintenance activity and/or in-field construction oversight.

d. The City will establish a storm drain stenciling program. A map of the labelled drains is available. In addition, new inlets will be labeled with markers that read "Only Rain in the Drain."

PUBLIC INVOLVEMENT AND PARTICIPATION

a. Public involvement/participation programs will comply with State and local notice requirements.

b. Applicable storm water management documents and this annual report are available for review at the City's website at https://www.idahofallsidaho.gov/370/Stormwater.

c. The City (Sanitation Department) will participate in the annual "Adopt-a-Canal" and ITD will continue with its "Adopt-a-Highway" clean-up programs.

ILLICIT DISCHARGE DETECTION AND ELIMINATION

The existing Idaho Falls Code of Ordinances contains provision for prohibition of pollutants to the sewer system as designated in Title 8, Chapter 1, Section 6 and Title 8, Chapter 1, Section 59 & 61 allows for searches to take place on private property.

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

It is expected that over the course of the permit, Idaho Falls may expand or reduce 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 in this SWMP. Currently Idaho Falls applies its ordinances and policies across the City's entire jurisdiction. As a result, permit conditions become effective upon any annexation/land acquisition.

2 MAP OF THE SEPARATE STORM SEWER SYSTEM

The MS4 Map and Drainage area is current/complete and included in the attachment 1 The map will be updated annually with the permit report submittal. The most current map can be accessed online at the following website : Stormwater | Idaho Falls, ID (idahofallsidaho.gov)

2.1 Topography

The population of the combined permittee's MS4 is over 30,000 people residing in Idaho Falls. The primary land-use is residential and commercial, with some industrial areas.

The MS4 permit area covers an area of ~4,640 acres in the City of Idaho Falls. It slopes gently south, having few topographic features, other than lava basalt outcrops and the Snake River.

2.2 MS4

Boundary/drainage area The City of Idaho Falls is larger than the MS4 permit area. The MS4 boundary is based on the extent of the permittees' MS4 system within the City of Idaho Falls that drains to WOTUS (see attached map). Areas shaded green on the map are within the MS4 boundary. All remaining portions of the City of Idaho Falls stormwater infiltrates into the ground with no MS4/WOTUS connection.

Idaho Falls/ITD permittee area within the MS4:

1. Total Area of MS4 served = 21,834,803 sq ft
2. City of Idaho Falls area within MS4 = 18,798,005 sq ft
3. Idaho Transportation Department = 3,036,798 sq ft

Outfalls and drainage areas are listed in the receiving waters table 1 in section 1.2. Idaho Falls uses I-worq (street and utility asset management system) to storm drain inlet and outfall inspections. This asset management program interfaces with our GIS program to be up to date in real time.

3 TARGETING POLLUTANTS OF CONCERN

Even though, this MS4 does not discharge to impaired waters, this plan will continue to strive to prevent discharges to waters of the US by monitoring the storm water construction activities in the MS4 permit area and striving to mitigate risks associated with construction activities in the permitting process.

4 LEGAL AUTHORITY AND ENFORCEMENT

4.1 Illicit Discharge Detection and Elimination

The City has established a mechanism to detect and eliminate illicit discharges to the MS4. This involves notification of the Sewer Department to respond to a discharge and determine the source. Municipal employees have been trained to be aware of illicit discharges if they are noticed in the field. The Sewer Department will keep record of the discharge through paper filings.

The existing Idaho Falls Code of Ordinances contains provision for prohibition of pollutants to the sewer system as designated in Title 8, Chapter 1, Section 6 and Title 8, Chapter 1, Section 59 & 61 allows for searches to take place on private property. The ordinance can be seen at City Code | Idaho Falls, ID (idahofallsidaho.gov).

ITD – Illicit discharge reporting and response is handled as part of project contract requirements, ITD BMP Manual NS-6 NS-6 Illicit Connection-Illegal Discharge Detection and Reporting.pdf (idaho.gov), and as per applicable codes and ordinances where the state roadway facility is located. The ITD Standard Specifications for Highway Construction SpecBook18.pdf (idaho.gov) 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).

4.2 Spill Prevention & Dumping

City ordinances also exist which allow for enforcement of the established storm water policy. Ordinances addressing these compliance issues include the are in Title 8, Chapter 1, Sections 91-93. Dumping and litter is addressed in City Ordinance Title 5, Chapter 4 Section 2 and Title 5 Chapter 8 sections 6 &9. The ordinance can be seen at City Code | Idaho Falls, ID (idahofallsidaho.gov).

ITD – Spill reporting and response is handled as part of project contract requirements, ITD BMP Manual Waste Management chapters Chapter 4 - Waste Management Best Management Practices.pdf (idaho.gov), and as per applicable codes and ordinances where the state roadway facility is located. Proper disposal of oil and toxic materials is handled as part of project contract requirements under ITD Standard Specifications for Highway Construction SpecBook18.pdf (idaho.gov), ITD BMP Manual Waste Management chapters, and as per applicable codes and ordinances where the state roadway facility is located.

4.3 Construction Erosion Control

Improper erosion and sediment control of individual construction sites shall prevent issuance of the certificate of occupancy. The City has also adopted a Construction Site Erosion Control Ordinance in Title 8 Chapter 14 that references these requirements. The ordinance can be seen at City Code | Idaho Falls, ID (idahofallsidaho.gov).

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. 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 SpecBook18.pdf (idaho.gov) require stormwater plans be approved by ITD staff prior to commencing construction. 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 Index (idaho.gov).

4.4 Interconnected MS4

The area under this MS4 permit is not subject to interconnection with any other MS4's.

4.5 Required Compliance

City codes 5-4-2 & 8-14-8 references the Enforcement actions for violations not in compliance City Code | Idaho Falls, ID (idahofallsidaho.gov).

ITD – ITD BMP Manual NS-6 Illicit ConnectionNS-6 Illicit Connection-Illegal Discharge Detection and Reporting.pdf (idaho.gov) / Illegal Dumping or Discharge requires compliance with applicable federal, state and local requirements in which the state roadway facilities are located.

4.6 Construction Site Inspection/Oversite

Idaho Falls establishes Construction site runoff control inspections during construction in City Code 8-14-6 and enforcement actions in 8-14-8 and 10-4-4 City Code | Idaho Falls, ID (idahofallsidaho.gov).

ITD – ITD has oversight on all department construction projects and has standards in place via contract specifications and standard specifications SpecBook18.pdf (idaho.gov) to inspect and enforce 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 Index (idaho.gov). 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.

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

The following sections describe Idaho Falls and ITD District 6's program to reduce pollutants in the MS4 discharges to the maximum extent practicable, as required by Permit Part 3. Each section summarizes the mandatory program, and describes how Idaho Falls and ITD District 6 meets each program component.

5.1 Construction Site Runoff Control

To control the discharge of storm water and pollutants from land disturbance during the construction phase Idaho Falls and ITD District 6 must:

- ✓ Require appropriate erosion, sediment, and waste management requirements for construction site activity that results in land disturbance of 5,000 square feet (ft2) 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.

5.1.1 Erosion, sediment, and waste management requirements for construction site activity:

The City has established an ordinance to address Erosion, sediment, and waste management within the MS4.

The existing Idaho Falls Code of Ordinances contains provision for Erosion and Sediment control as designated in Title 5, Chapter 4, Section 2 (Street debris) and Title 8, Chapter 4, Section 6 (Waste management) and Title 8 Section 14 (Construction Site erosion control). These ordinances can be seen at City Code | Idaho Falls, ID (idahofallsidaho.gov).

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. 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 SpecBook18.pdf (idaho.gov) require stormwater plans be approved by ITD staff prior to commencing construction. 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 Index (idaho.gov).

5.1.2 Installation and use guidelines:

Idaho Falls maintains Contractor training handouts for Erosion and Sediment control best management practices referenced at this website Building | Idaho Falls, ID (idahofallsidaho.gov)). This handout references the use to the Idaho DEQ BMP installation guide to be incorporated into the work herein at 2015AFP36 2020 BMP Catalog Update - FULL DOCUMENT - 4-21-2020(2).pdf.

ITD maintains a Stormwater BMP manual at Environmental | Idaho Transportation Department

5.1.3 Preconstruction site plans review:

Idaho Falls site plan requirements include the requirement of Storm Water protection via inclusion of BMP's in the site plan note #19 on the requires site plan template) as well as the requirement of the separate Strom Water protection plan if the site disturbance is greater than an acre. This is a listed requirement in the City Site plan requirements checklist: Storm Water Pollution Prevention Plan (SWPPP) required if disturbance over 1 acre or part of a larger development that has a total disturbance over 1 acre. Site plans are reviewed for approval prior to construction by the Idaho Falls, Fire, Power, Water, Wastewater, Survey, Engineering and Public Works Department. Engineering completes the site plan reviews for storm water management and BMP's incorporated accordingly. City Code 8-14-3 thru 8-14-5 references the requirements review, and details necessary of the Erosion & Sediment Control plans.

For ITD permitted work within the MS4 limits, ITD will require developers to work with the City of Idaho Falls and comply with the City of Idaho Falls Site Plan Erosion Sediment & Control BMP requirements. ITD reviews an Erosion Sediment & Control Plan (ESCP) or a Storm Water Pollution Prevention Plan (SWPPP) whichever is applicable on all roadway construction projects administered in their jurisdiction.

5.1.4 Inspection & Enforcement of Erosion & Sediment Control Plans:

Idaho Falls incorporates the Inspection of the Erosion & Sediment Control plans with the Building permit department. Erosion & Sediment Control inspections are tracked with each building permit associated with a site plan. Where corrective actions are noted to be required, follow-up inspections are performed until compliance is obtained and prior to acceptance/issuance of the Certificate of Occupancy. Where necessary, the permittee is issued a stop work order until the corrective action is completed. City Code 8-14-6 thru 8-14-8 references the Inspection and Enforcement requirements of the Erosion & Sediment Control plans.

ITD requires an ESCP or a SWPP (where disturbance is greater than one acre and drains to the WOTUS) on all roadway construction projects administered in their jurisdiction.

5.1.5 Inspection Prioritization Plan:

For construction projects greater than one acre and subject to draining to waters of the US, on City or ITD roadways, construction contractors are required to follow DEQ/EPA NPDES Construction General Permit requirements. For construction projects less than one acre or not subject to draining to waters of the US, on City or ITD roadways, construction contractors are required to follow standard Erosion & sediment Control practice.

For development/private construction projects, the ESC permit risk level/site priority is determined during the pre-construction site plan/improvement drawing review process based on the project's ESC permit type, size, and location of the project. If a construction site has been issued a Construction Permit the operator must comply with the approved permit requirements. Once a project is in progress, Engineering staff schedule and implement inspections based on project priority and status.

Inspections scheduled by Engineering Staff are prioritized by the project requirements of the Construction General Permit first, followed by projects requiring standard erosion and sediment control practices, and lastly general permitted project for smaller development/private construction activities. When compliance items are noted to be addressed, the follow-up inspections are scheduled to be conducted with a higher priority.

5.1.6 Enforcement response policy:

For construction projects greater than one acre and subject to draining to waters of the US, on City or ITD roadways, construction contractors are subject to fines assessed by EPA/DEQ established by the NPDES Construction General Permit. For construction projects less than one acre or not subject to draining to waters of the US, on City or ITD roadways, construction contractors are subject to withheld progress payments until compliance is achieved.

For development/private construction projects, City Code 8-14-8 addresses the Enforcement policy for Construction Site Erosion Control for development. These codes can be seen at City Code | Idaho Falls, ID (idahofallsidaho.gov).

ENFORCEMENT ESCALATION RESPONSE POLICY

City - The City responds to a number of notices of construction site off tracking on City streets, which generally occur in the spring of the year. The City locates the contractors and informs them that they are required to clean the sediment from the roadway and properly dispose of the material. If they are unable to complete this work, the Street Department deployed sweepers to remove the material from the roadway and the contractor is charged for this cleaning service.

ITD – ITD relies on contract specifications and the Idaho Transportation Department 2020 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.

5.1.7 Staff Training:

Through Standard Specifications and Planning and Zoning requirements, the City has published or distributed local requirements for construction site operations to implement appropriate erosion and sediment control BMP"s and control waste. A class entitled "Sediment and Erosion Control Procedures for Construction Sites" was developed and is provided on-line at the City website: https://www.idahofallsidaho.gov/269/Building. All building contractors licensed to work within the City of Idaho Falls are required to have a responsible person that has completed this class. In addition the City developed an Erosion and Sediment Control presentations and the slides can be viewed at https://www.youtube.com/playlist?list=PLwm1wlc_9LLc0INlYSHybQF-0uWfqt4lf

The City through the use of Standard Specifications requires that all new development comply with Construction General Permit requirements. Existing city ordinances that address Training are required per City Code 8-14-7 located at City Code | Idaho Falls, ID (idahofallsidaho.gov).

ITD will provide oversight and direction to contractors working on District projects to ensure compliance with the Construction General Permit. This requirement is fulfilled through specifications included within each contract and field inspections/reports completed while under construction. ITD personnel are required to attend an ITD approved training and hold certification of training.

Consultants and contractors working on ITD projects are required to attend a Water Pollution Control Manager (WPCM) training course approved by ITD and hold current certifications.

5.2 Storm Water Management for Areas of New Development and Redevelopment

To control the discharge of storm water and pollutants from land disturbance and development, after construction is completed, City of Idaho Falls and the Idaho Transportation Department District 6 must:

- ✓ Require the installation and long-term maintenance of permanent storm water controls at new development and redevelopment project sites that result from land disturbance of 1 acre or more.
    - Permanent storm water controls must be sufficient to retain onsite the runoff volume produced from a 24-hour, 95th percentile storm event; or sufficient to provide the level of

pollutant removal greater than the pollutant removal expected by using onsite retention of runoff volume produced from a 24 hour, 95th percentile storm event.
    - Alternatively, storm water treatment requirements must be required that can attain an equal or greater level of water quality benefits as onsite retention of storm water discharges from new development and redevelopment sites.
    - Other alternatives may be allowed for projects to meet the onsite retention requirement at a particular project site based on technical infeasibility, and/or site constraints.

- ✓ Establish proper installation and use guidelines for permanent storm water controls – the Permittee may establish different types of controls for different types and/or sizes of site development activity.

- ✓ At a minimum, review and approve preconstruction plans for permanent storm water controls at new development and redevelopment sites that result from land disturbance of one (1) or more acres

- ✓ Periodically inspect "high priority" permanent storm water controls for proper installation and operation, using an inspection prioritization system

- ✓ Maintain an inspection prioritization plan and enforcement response policy,

- ✓ Maintain a database inventory to track and manage the operational condition of permanent storm water controls

- ✓ Ensure the appropriate Permittee staff is trained to conduct these activities.

5.2.1 Permanent Control Requirements of New Development

City Code 10-5-3 requires Developers/Landowners to provide adequate provisions for disposal of surface waters originating therefrom by wholly self-contained system of pumps and retention ponds, swales or underground infiltration systems. For purposes of determining adequacy of such facilities a minimum design standard of 1.33 inches over frozen ground shall be used. These codes can be seen at City Code | Idaho Falls, ID (idahofallsidaho.gov).

Site storm water requirements, include calculations. Owner is responsible for containing or disposing of onsite storm water the specified volume per the City Code. For the events that lead to volumes greater than that per the City Code, developers are allowed to "overflow" to the City storm system under controlled flow systems in order to mitigate overland flooding to the street systems.

5.2.2 Permanent Control Installation & Use Guidelines

City Code 10-5-3 requires Developers/Landowners to provide adequate provisions for disposal of surface waters originating therefrom. Idaho Falls Engineering Department maintains the design guidelines for Storm Drainage to address Storm Water features such as Inlet Boxes, Cross Drains, Pipes, Manholes and

Retention ponds. These standards can be seen at Development Document Downloads | Idaho Falls, ID (idahofallsidaho.gov). Developer is responsible for designing, constructing and maintaining onsite storm water controls.

5.2.3 Permanent Control Plan Review for New Development

Prior to development/construction, Developers are required to submit a Site Plan for review and approval by the City. The Idaho Falls City Engineer reviews the site plans for compliance with the Storm Water requirements prior to approval. The requirement for storm water design submittal are maintained on the site plan submittal checklist shown at Development Document Downloads | Idaho Falls, ID (idahofallsidaho.gov).

Pertinent items on this list include:

☐ Site storm water requirements - include calculations. Owner is responsible for containing or disposing of on-site storm water.

☐ Storm Water Pollution Prevention Plan (SWPPP) required if disturbance over 1 acre or part of a larger development that has a total disturbance over 1 acre.

5.2.4 Permanent Storm Water Control Inspections

The City inspects every outfall under this permit annually. When outfall inspections show water flowing during dry weather flows, the flows are tracked to the source and corrected. When outfalls show flows of concern, the Idaho Falls Sewer department is notified to respond to a discharge and determine the source. The Storm System form the outfalls are evaluated accordingly and tracked for function.

When standing water is observed in the ponds, the City is notified and the permanent controls are evaluated for function and addressed where necessary.

5.2.5 Permanent Storm Water Control Inspection Prioritization, Condition Tracking & Enforcement Policy

For development/private construction projects, the Permanent Storm Water Control risk level/site priority is determined during the pre-construction site plan/improvement drawing review process based on the Permanent Control's type, size, and location. Once a Permanent Control is accepted Wastewater Division staff schedule and implement inspections based on Control feature and status. In the event that control items are noted to be addressed, follow-up inspections are scheduled to be conducted with a higher priority.

Idaho Falls uses I-worq (street and utility asset management system) to track and report annual storm drain inlet inspections/condition and outfall inspections. This asset management program interfaces with our GIS program to be up to date in real time.

When a Permanent Control is discovered to be not functioning properly, Division staff work with Engineering to assess the status of the acceptance and responsibility for the maintenance and function

of the Permanent Control measure. In the event that the Permanent Control was not constructed properly, the Developer is put on notice to correct the situation. In the event that the corrective action is not addressed in a timely manner, the City will correct the Permanent Control and assess costs/liens on the property that the Permanent Control serves.

5.2.6 Staff Training for Permanent Storm Water Control Inspection & Maintenance

The City and ITD has provided relevant and appropriate storm water management education and training for staff that hold positions responsible for maintenance activity and/or in-field construction oversight. The City inspects every outfall under this permit annually. Municipal employees are trained internally to inspect and maintain the Permanent Controls as part of the job requirements of working on the City Storm System.

5.3 Pollution Prevention/Good Housekeeping for MS4 Operations

To properly operate and maintain the MS4, and its facilities using prudent pollution prevention and good housekeeping, City of Idaho Falls and the Idaho Transportation Department District 6 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 for Permittee-owned Facilities;
- ✓ Work cooperatively with other entities to control litter on a regular basis;
- ✓ Ensure the appropriate Permittee staff is trained to conduct these activities.

5.3.1 Map of the MS4

The MS4 boundary is based on the extent of the permittees' MS4 system within the City of Idaho Falls that drains to WOTUS (see attached map). Areas shaded green on the map are within the MS4 boundary. All remaining portions of the City of Idaho Falls stormwater infiltrates into the ground with no MS4/WOTUS connection.

Outfalls and drainage areas are listed in the receiving waters table 1 in section 1.2. Idaho Falls uses I-worq (street and utility asset management system) to complete storm drain inlet and outfall inspections. This asset management program interfaces with our GIS program to be up to date in real time.

5.3.2 Catch Basin Inlets Inspections

The City inspects Catch basins under this permit throughout the year. Idaho Falls uses I-worq (street and utility asset management system) to complete storm drain inlet and outfall inspections. This asset management program interfaces with our GIS program to be up to date in real time.

When outfall inspections show water flowing during dry weather flows, the flows are tracked to the source and corrected. All flows during dry weather are deemed illicit discharges. Municipal employees have been trained to be aware of illicit discharges if they are noticed in the field.

5.3.3 Catch Basin Maintenance

Idaho Falls uses I-worq (street and utility asset management system) to complete and track storm drain inlet and outfall inspections and maintenance activities. This asset management program interfaces with our GIS program to be up to date in real time.

5.3.4 Street Sweeping

One of the integral parts of Idaho Falls' and the Idaho Transportation Department District 6, within the MS4 Boundary area, annual street maintenance activities involve sweeping of debris before the deposits can enter the storm system. Annual training is conducted by the Street Department to ensure that staff understands the most efficient means of removing debris from the streets and understands the value in keeping this material out of our storm systems.

5.3.5 O & M Procedures for other Municipal Areas

The City of Idaho Falls conducts site plan development reviews on City development projects as well as private party development projects to assure that the storm drainage is maintained on site. These would include drainage areas for roofs, parking lots, and property amenities. In the rare cases where the development drainage is allowed to intermingle with the street drainage maintained by the City Street department, the drainage in this case is conveyed to storage and infiltration ponds that do not discharge to the WOTUS.

5.3.6 BMP's (pesticides, herbicides and fertilizers)

Idaho Falls Public Works Department works with other City departments to ensure pollution prevention and good housekeeping practices are conducted for the following activities:

- grounds/park and open space maintenance (IF Parks Department);
- fleet maintenance and vehicle washing operations (IF Municipal Services Department);
- building maintenance (IF Municipal Services Department);
- snow management and snow disposal sites (IF Street Department);
- solid waste transfer activities (IF Sanitation Department);
- municipal golf course maintenance (IF Parks Department);
- materials storage (IF Municipal Services Department);
- heavy equipment storage areas (IF Municipal Services Department);
- hazardous materials storage(IF Municipal Services Department) ;
- used oil recycling (IF Municipal Services Department); and
- spill control and prevention measures for municipal refueling facilities (IF Municipal Services Department).

5.3.7 Litter Control

The City through the use of Standard Specifications requires that all new development comply with Construction General Permit requirements. Existing city ordinances that address litter and waste control are referenced in City Code 5-4-2 Public Streets, 5-8-6 Improper Hauling of Litter, 5-8-9 Litter on Private Property, 10-1-5 General Subdivision Standards. These codes can be seen at City Code | Idaho Falls, ID (idahofallsidaho.gov).

5.3.8 Training

The Idaho Falls Water Department conducts annual training informing its employees how to respond to water wasting complaints. In addition, the Water Department publishes an annual flyer that addresses water conservation. A copy of the flyer is included within the appendices. Also included within the appendices are work orders associated with specific property addresses that were inspected for water wasting.

Training has been conducted for municipal personnel related to optimal maintenance practices for the protection of water quality. One of the integral parts of annual street maintenance involves sweeping of debris before the deposits can enter the storm system. Annual training is conducted by the Street Department to ensure that staff understands the most efficient means of removing debris from the streets and understands the value in keeping this material out of our storm systems.

5.4 Illicit Discharge Detection and Elimination

To prohibit and eliminate illicit discharges to the MS4, the City of Idaho Falls and the Idaho Transportation Department District 6 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.

5.4.1 Ordinance Enforcement

The existing Idaho Falls Code of Ordinances contains provision for prohibition of pollutants to the sewer system. Existing city ordinances that provide for this are referenced in City Code 8-1-6 Sewage to be Discharged to the Wastewater Treatment System, 8-1-8 Unpolluted Water Discharged to Storm Drain, and 8-1-59 Inspection and Sampling, 8-1-61 Search Warrants. These codes can be seen at City Code | Idaho Falls, ID (idahofallsidaho.gov).

5.4.2 Response to Complaints or Reports from the Public

The City has established a mechanism to detect and eliminate illicit discharges to the MS4. This involves notification, by City staff or the Public, of the Sewer Department to respond to a discharge and determine the source. Municipal employees have been trained to be aware of illicit discharges if they are noticed in the field. The Sewer Department will keep record of the illicit discharge activities through paper filings.

5.4.3 Complaint/Report Tracking

The Sewer Department will keep record of the illicit discharge complaints and correction activities through paper filings tracking the Storm Drain report system in I-worq. Reports of this tracking will be incorporated in the Permit annual reports.

5.4.4 Conduct MS4 outfall screening inspections during dry weather;

The City Sewer Department pre-treatment personnel will conduct dry weather field screening for non-

storm water flows from storm water outfalls. Outfall inspections will be tracked.

5.4.5 Recurring Illicit Discharge & Dry Weather Screening Follow-up

The Sewer Department will keep record of the illicit discharge complaints and dry weather screening via tracking in our I-worq system. Any inspections or complaints requiring corrective actions will have a follow-up inspection within 30 days.

5.4.6 Actions to address ongoing Illicit Discharge

When direction regarding corrective actions to mitigate Illicit discharges are not addressed, legal actions including Injunctive Relief (City Code 8-1-90), Civil Penalties (City Code 8-1-91) and Criminal Penalties (City Code 8-1-92) will be initiated. These codes can be seen at City Code | Idaho Falls, ID (idahofallsidaho.gov).

5.4.7 Spill Prevention and Response & Coordination/Oil & materials disposal/Training

The City will participate in a Household Hazardous Waste Collection Program with the Idaho Department of Environmental Quality (IDEQ), Bonneville County and the City of Ammon. This program informs residents what household hazardous waste is and establishes a disposal guide for a variety of hazardous wastes. The program also discusses why proper disposal is necessary and what individuals could do to create less hazardous waste. Household hazardous waste collection days are established for the 2nd Saturday of each month beginning in May and ending in September. On these dates residents are encouraged to bring specific wastes to sites identified for collection and proper disposal.

City Emergency response personnel are equipped with accident spill kits to mitigate hazardous waste and chemical spills to the storm drain. City Personnel have proper Training to use the kits and clean the site accordingly.

5.5 Education, Outreach, and Public Involvement

GOALS

The goal of the education and outreach program is to reduce the behaviors and practices that cause or contribute to adverse stormwater impacts on receiving waters by increasing audience understanding of actions they can take to prevent pollutants in stormwater runoff entering the MS4 and into local receiving waters.

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

Within one year of the Permit effective date, The City of Idaho Falls Public Works Department must, at a minimum:

1. Select at least one audience and focus its efforts on conveying relevant messages

    a. Distribute and/or offer at least eight (8) educational messages or activities over the permit term to selected audience(s)
    b. Begin to assess, and track, activities to gauge the audience's understanding of the relevant messages and adoption of appropriate behaviors.

2. Target specific educational material to the construction/engineering/design community regarding construction site runoff control and permanent storm water controls.

3. Maintain and advertise a publicly accessible website to provide all relevant SWMP materials.

PUBLIC OUTREACH RESPONSE PLAN

Below is a summary of the Public Outreach Plan. Due to the COVID-19 pandemic impacting the ability to perform some outreach activities, most of the outreach was done via print or internet. The majority of the outreach material was focused on the late-teen to adult demographics. To review details, please refer to the Stormwater Impact Public Outreach Plan & Results document posted at Stormwater | Idaho Falls, ID (idahofallsidaho.gov).

1. Distribute eight (8) education messages:
    a. Printed Brochure: Stormwater Pollution Prevention
    b. You Tube Videos (2)
        i. Don't dump harmful chemicals or excess fertilizer into the street or gutter.
        ii. You can make a big impact on water conservation by doing a lot of little things.
    c. Facebook (3)
        i. Stormwater Runoff
        ii. Save Water (indoor methods)
        iii. Save Water (outdoor methods)
    d. Twitter (3)
        i. Stormwater Runoff
        ii. Save Water (indoor methods)
        iii. Save Water (outdoor methods)
2. Assess and track message measurable metrics
3. Target material to construction/engineering/design community - Education and testing for the construction, engineering, and design community is conducted through the City's Community Development Services Department/Building Division. Access to Contractor, Inspector, Plan Designer tests, videos and class handouts are available on the City's website.
4. Publicly accessible website for SWMP material: www.idahofallsidaho.gov. Click on Public Works/Water/Water Conservation.

6 RECORD KEEPING

6.1 Annual Compliance Evaluation

Annual reporting, supporting documentation, and compliance assessments per the Permit will be posted City of Idaho Falls Website available to the public at the following link:

https://www.idahofallsidaho.gov/370/Stormwater

6.2 Alternative Control Measure Requests

Alternative Control Measures (ACM's) are not anticipated to be necessary at this time. In the event that an ACM is identified to be necessary, it will be submitted for review and approval per the permit. This documentation (if necessary) will be made available for review at the City Stormwater Website:

https://www.idahofallsidaho.gov/370/Stormwater

6.3 Adaptive Management Actions

Adaptive Management Actions are not anticipated to be necessary at this time. When an adaptive management action is required, it will be addressed per the permit. This documentation (if necessary) will be made available for review at the City Stormwater Website:

https://www.idahofallsidaho.gov/370/Stormwater

ATTACHMENT I MS4 STORMWATER INFRASTRUCTURE MAPS