



State of Oregon
Department of
Environmental
Quality

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Annual Report

ODOT's MS4 Phase I Permit

National Pollutant Discharge Elimination System
MS4 Stormwater Discharge Permit

2025
Monitoring Year

Oregon Department of Transportation
June 1, 2026

DEQ File Number 101822

1.0 Certification and Signature

1. **Permit Registrant(s):** Oregon Department of Transportation
2. **Legally Authorized Representative:** Rebecca Burrow
3. **Title:** Maintenance Services Manager
4. **Email:** rebecca.burrow@odot.oregon.gov
5. **Phone:** 503-951-9333

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 am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations (40 CFR 122.22(d)).

Signature: Rebecca Burrow

Date: 5/13/26

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Instructions

At least once per year, the permit registrant must evaluate compliance with the requirements of the MS4 Phase I general permit using this Annual Report template. This self-evaluation includes assessment of progress made towards implementing the Stormwater Management Program Document (SMPD) control measures in Schedule A, and implementation of actions to comply with any additional requirements identified pursuant to Schedule D.1 (Requirements for Discharges to Impaired Waterbodies).

For each SMPD control measure or activity listed below, please answer all the questions and in the comments field cite any relevant information and/or statistics that helps to illustrate implementation or compliance. If your answer is "No," in the comments field explain the reasons and outline the anticipated implementation timeline. If the requirement does not apply, explain why it is not applicable in the comments field.

No later than June 1 each year, beginning in 2021, the permit registrant must submit an Annual Report to DEQ. One signed copy and one electronic copy must be submitted to DEQ using the address provided in permit. DEQ can provide an FTP site for submittal of the electronic copy, upon request.

2.0 General Information		
2.1 Registrant Information		
6. Permit Registrant(s): Oregon Department of Transportation (ODOT)		
7. Type(s): <input type="checkbox"/> City / <input type="checkbox"/> County / <input type="checkbox"/> Special District / <input checked="" type="checkbox"/> Other: Transportation Agency		
8. Registrant Type: Existing Registrant: <input checked="" type="checkbox"/> New Registrant: <input type="checkbox"/>		
9. MS4 Type: Large Community: <input type="checkbox"/> Small Community: <input type="checkbox"/> Statewide: <input checked="" type="checkbox"/>		
10. DEQ Permit No: 101822		
11. EPA File No: 110870		
12. Physical Address: 355 Capitol Street NE, MS11		
City: Salem	State: Oregon	Zip: 97301
13. Point of Contact: Ted Hart		
Title: Clean Water Coordinator	Email: Ted.Hart@odot.oregon.gov	Phone: 503-991-9367
14. Mailing Address (if different): 455 Airport Road SE		
City: Salem	State: OR	Zip: 97301
2.2 Municipal Separate Storm Sewer System (MS4) Information		
15. Estimate the area served by the MS4: This statewide permit applies to the geographic area encompassing the municipal separate storm sewer system associated with Oregon Department of Transportation (ODOT) owned and/or operated roads, maintenance yards, rest areas, and other facilities located in ODOT highway right-of-way that discharge stormwater to surface waters of the state.		
2.3 MS4 Stormwater Discharge Information		
<i>Identify the names of all known waters that receive a discharge from your MS4.</i>		
16. This permit applies to discharges to receiving waters statewide.		
2.4 Coordination Among Registrants and Joint Agreements		
<i>Required for permit registrants relying on another entity to satisfy one or more of the requirements of the permit.</i>		
17. Is there a joint agreement in place for the implementation of one or more stormwater management program control measures? <i>Schedule A.2</i> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		
18. If yes, has there been any change to the joint agreement(s) submitted previously? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, include, as an attachment, a summary of the changes.		
2.5 Stormwater Management Program Information		
19. Discuss the status and overall progress of establishing legal authority to control pollutant discharges into and discharges from the MS4 and to implement and enforce the conditions of this permit. <i>Schedule A.2.b</i> ODOT utilizes relevant regulatory mechanisms as allowed pursuant to applicable state law. These mechanisms are discussed in detail in Section 1.2 of ODOT's Stormwater Management Program Document (SMPD).		

2.6 Stormwater Management Program (SMP) Information
<p>20. Is an updated SMP Document (SMPD) Schedule A.2.d Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If necessary, provide an explanation: A summary of SMPD changes is included on the final page of the updated SMPD, Attachment 1.</p>
<p>21. Identify the publicly accessible website where the SMPD Document is posted. Schedule 2.c & A.3.b.ii ODOT completed additional updates to its website in 2025. The MS4 materials are located on ODOT's Stormwater Permits page. If necessary, provide an explanation: N/A</p>
<p>22. Does the SMPD include an implementation schedule for control measures that have yet to be or are partially implemented? Schedule A.2.c Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If necessary, provide an explanation: All applicable minimum control measures have been implemented.</p>
<p>23. Describe the method used to gather, track, and use SMPD information to set priorities or assess compliance: Schedule A.2.d ODOT's stormwater program requires participation and involvement from multiple sections and business lines within the agency. The Maintenance and Operations Branch (MOB), the Hydraulics Engineering Section (HES), the Environmental Section, and the Regions work together to ensure technical programs are aligned. ODOT's Maintenance and Operations Branch (MOB) is responsible for administration of the permit, which includes tracking progress toward implementation of the minimum control measures and reporting compliance activities. The Clean Water Coordinator in MOB gathers the report information and works with other program leads within ODOT to assess compliance, set goals, update the SMPD, and write annual Reports.</p>
<p>24. Have adequate finances, staff, equipment and other support capabilities been provided to implement the permit? Schedule A.2.e Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If necessary, provide an explanation: N/A</p>
<p>25. During this monitoring year was compliance with the requirements of this permit evaluated? Schedule B.1 Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If necessary, provide an explanation: ODOT staff reviewed its MS4 permit requirements to confirm implementation deadlines for each of the minimum control measures, which have been met within the applicable deadlines in preparation for submission of this report.</p>
<p>26. During this monitoring year was it determined or reported that discharge from the MS4 caused or contributed to an exceedance of an applicable water quality standard? Schedule A.1.b Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If necessary, provide an explanation: N/A</p>

3.0 Stormwater Management Program Control Measures

3.1 Public Education and Outreach

27. Provide a brief summary of the ongoing public education and outreach program. Schedule A.3.a

This minimum control measure has been fully implemented. ODOT provides educational messages through formal training and informal field training opportunities as well as at public meetings. ODOT's education and outreach program targets the general public, contractors and ODOT employees responsible for inspecting construction project activities and other ODOT employees, such as maintenance staff, about the potential impacts of stormwater on water quality around the state.

The education and outreach activities for 2025 are detailed in number 29 below.

ODOT's Region 1 published and continues to update a webpage detailing the [Willamette River Stormwater Improvement Project](#) in which ODOT is building 20 stormwater treatment facilities to clean stormwater runoff from the Fremont Bridge (I-405), the St Johns Bridge (U.S. 30 BY) and U.S. 30 in NW Portland.

28. Were the required components in place by the implementation date? Schedule A.3.a.i

Yes No (Implementation date: June 1, 2022)

29. Provide the number of education and outreach activities conducted: Schedule A.3.a.iii

- 5 Pesticide trainings (ODOT employees);
- 3 Presentations for the Oregon State University Pesticide Safety Education Program (PSEP), with two focused on Roadside Vegetation Management and two focused on Pesticide Best Management Practices (BMPs);
- 1 Winter maintenance training sessions (ODOT employees);
- 1(25) Environmental Construction Inspector (ODOT employees);
- 1(14) Erosion & Sediment Control Manager (contractors);
- 0 Routine Road Maintenance, Water Quality & Habitat Guide Best Management Practices (here after called "Blue Book") training classes (ODOT employees);
- 1 Structural stormwater control (SSC) maintenance training (55 ODOT employees);
- 14 [Online open houses](#) providing an opportunity for public input on ODOT projects (general public);
- 1 Catch basin filter insert training conducted with 1 ODOT employee at Portland Columbia Blvd Maintenance yard
- 4 New Employee Environmental Awareness Trainings (NEEAT) conducted with 45 ODOT employees at ODOT facilities;
- 1 Management level Blue Book refresher training for District 1 with approximately 50 participants. Included law enforcement (public) and ODOT safety and maintenance staff.

30. Indicate target audiences addressed during this reporting year: Schedule A.3.a.iv(A)

- General public, including freeway commuters
- Contractors and/or ODOT employees responsible for inspecting construction project activities
- Other ODOT employees, as appropriate

31. Have each target audience been addressed during the permit term? Schedule A.3.a.iv

Yes No

32. Indicate target topics addressed during this reporting year: Schedule A.3.a.iv(B)

- Illicit Discharge identification and reporting procedures
- Impacts of illicit discharges on Oregon's waterways
- Impacts from roads and appropriate techniques to avoid adverse impacts
- Research opportunities related to stormwater
- Best management practices for litter and trash control
- Best management practices for recycling programs
- Low-impact development/green infrastructure

- Watershed awareness and how storm drains lead to local creeks and rivers, and potential impacts to fish and other wildlife
 Other:

33. Describe the types of educational messages or activities distributed and/or offered during this reporting year. *Schedule A.3.a.iii*

- Printed materials
 Electronic materials
 Social media
 Targeted workshops
 Other:

34. Was outreach offered in the Willamette Basin during this reporting year? *Schedule A.3.a.iii*

Yes No

35. Total number during the permit term: ODOT provides multiple training opportunities, project open houses, and public meetings regarding the target topics for each of ODOT's target audiences annually. ODOT has met the implementation requirement to distribute at least 2 messages annually, reaching all target audiences, including at least 1 message in the Willamette Basin each year.

36. Identify and describe the assessment/evaluation of, at least, one education and outreach activity that occurred during this reporting year. Include the assessment process or metric for evaluation, and why this activity was considered successful. *Schedule A.3.a.v*

Prior to 2024 ODOT erosion and sediment control (ESC) training, the requirements and conditions of the recently revised NPDES 1200-CA permit was not generally understood. To assess this lack of understanding, the ESC Program Leader monitored the number of questions relating to this issue, receiving multiple questions per week. After conducting ESC trainings and posting guidance materials, the frequency of inquiries regarding ESC and compliance with the NPDES permit compliance fell to about one inquiry per month. It was concluded that the ESC trainings led to the decrease in ESC questions, reflecting a greater understanding of the requirements and a successful outcome of the trainings.

During Environmental Management System (EMS) hands-on training, trainees audit/evaluate the pollution prevention BMPs within the ODOT maintenance yard. After the audit, trainees have a group discussion, assess which BMPs to change, and effectively remedy any issues.

37. Will the assessment be used to inform future stormwater education and outreach efforts? *Schedule A.3.a.v*

Yes No

Provide an explanation: As ESC regulations change, training will be evaluated to ensure trainees are provided with the necessary information, BMPs, and resources to comply with these new regulations. Pollution prevention BMPs at maintenance yards are annually evaluated as maintenance methods change (e.g. deicing agents, new types of equipment, etc.).

3.2 Public Involvement and Participation
<p>38. Provide a brief summary of the overall progress towards implementation of this control measure. <i>Schedule A.3.b</i> ODOT exceeded its requirement to create or partner in the development of two public involvement opportunities during the permit term.</p>
<p>39. Were the required components in place by the implementation date? <i>Schedule A.3.b.i</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> (<i>Implementation date: June 1, 2022</i>)</p>
<p>40. Is the SMPD posted on a publicly accessible website? <i>Schedule A.3.b.ii</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>41. Was the publicly accessible website updated during this reporting year? <i>Schedule A.3.b.ii</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If necessary, provide an explanation: The same update was made on two ODOT websites; updating of the Clean Water Program Coordinator contact information on the MOB and HES websites.</p>
<p>42. Does the publicly accessible website include illicit discharge complaint/reporting information or procedures? <i>Schedule A.3.b.ii.A</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If necessary, provide an explanation: N/A</p>
<p>43. Does the publicly accessible website include links to official SMPD documents and relevant technical information? <i>Schedule A.3.b.ii.B</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If necessary, provide an explanation: N/A</p>
<p>44. Does the publicly accessible website include links to all policies and/or guidance documents related to the construction and post-construction stormwater management control programs? <i>Schedule A.3.b.ii.C</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If necessary, provide an explanation: N/A</p>
<p>45. Does the publicly accessible website include contact information for relevant staff, including phone numbers, mailing addresses and email addresses? <i>Schedule A.3.b.ii.D</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If necessary, provide an explanation: N/A</p>
<p>46. Describe the public involvement opportunities offered during this reporting year. <i>Schedule A.3.b.iii</i> <input checked="" type="checkbox"/> Public input through project planning and implementation process <input type="checkbox"/> Provide technical assistance to local watershed groups <input checked="" type="checkbox"/> Adopt-A-Highway <input checked="" type="checkbox"/> Other: Multiple opportunities to provide input on the Oregon Transportation Plan Update. ODOT participated in the Department of Land Conservation and Development (DLCD) green infrastructure grant process.</p>

3.3 Illicit Discharge Detection and Elimination

47. Provide a brief summary of the overall progress towards implementation of this control measure. Schedule A.3.c

This control measure has been fully implemented. Specific IDDE activities are described in Section 2.3 of the SMPD.

48. Were the required components in place by the implementation date? Schedule A.3.c.i

Yes No (Implementation date: June 1, 2022)

If necessary, provide an explanation: N/A

49. Have non-stormwater discharges into the MS4 been prohibited to the extent allowable under state law? Schedule A.3.c.ii

Yes No

If necessary, provide an explanation: Section 1.2 of the SMPD provides information on ODOT's legal authority to oversee its storm system.

50. Describe the written response procedures and process for referring illicit discharges to DEQ. The procedures must include timelines for initial compliance actions and subsequent referrals to DEQ. Schedule A.3.c.iii

Illicit discharges to the ODOT drainage system are identified through Road Patrols, Roadside Feature Inspections and reports from citizens or other public agencies. ODOT then tracks, and contacts and provides IDDE information to DEQ/local enforcement jurisdiction(s).

51. Is there a phone number, webpage, and/or other communication channel publicized for the public use to report illicit discharges? Schedule A.3.c.iv.A

- Phone number(s)
- Webpage(s)
- Other communication channels

If necessary, provide an explanation:

ODOT's [Report a Hazard](#) page includes phone numbers for non-emergency assistance (e.g. debris in the travel lane) and immediate road hazard (e.g. automobile accident). ODOT's Hydraulics Stormwater Management website ([Oregon Department of Transportation : Stormwater Management : Hydraulics : State of Oregon](#)) has a link to report illicit discharges ([Oregon Department of Transportation : Illicit Discharges : Hydraulics : State of Oregon](#)) including contact information for ODOT's Clean Water Program Coordinator (503-991-9367, [email](#)).

An illicit discharge occurs when anything other than stormwater enters ODOT's stormwater facilities. Dumping chemicals into storm drains, roadways, curb and buffer sidewalks, driveways and yards are all sources of illicit discharges. In 2024 ODOT determined that all facilities met the definition of Very Small Quantity Generator (VSQG)—and no longer tracks hazardous waste generation and disposal at ODOT facilities.

52. Provide the number of illicit discharge reports received during this reporting year. Schedule A.3.c.iv.E

Number: 7 reports related to IDDE, attachment 2 shows illicit discharge summary .

53. On average, how long did it take to respond to reports? Schedule A.3.c.iv.B

In working days: 12 hours average response time the same day the discharge was reported.

54. Provide the number of complaints that included notification of the Oregon Emergency Response System during this reporting year. Schedule A.3.c.iv.B

Number of notifications: 0

55. Provide the number of reports where ODOT staff performed an investigation during this reporting year. Schedule A.3.c.iv

Number: 7 reports

<p>56. On average, how long did it take to conduct an initial investigation? <i>Schedule A.3.c.iv.B</i> In working days: <u>Less than 24 hours after ODOT received the first report of the discharge.</u></p>
<p>57. Provide the number of illicit discharges that were referred to another entity during this reporting year. <i>Schedule A.3.c.iv.C</i> Number: <u>7</u></p>
<p>58. On average, how long did it take to notify the entity(s)? In working days: <u>0(same day as report)-12</u> If necessary, provide an explanation: For the majority of incidents, ODOT contacts another entity during the initial investigation the same day or the day after the illicit discharge report is submitted to ODOT.</p>
<p>59. Provide the number of spills reported to the ODOT Transportation Operations Center System. Number: <u>16</u> The Transportation Operations Center System (TOCS) Spill Report is included as Attachment 3.</p>
<p>60. Indicate which of the following are included in the complaints or reports tracking documentation: <i>Schedule A.3.c.iv.E</i></p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Date the complaint was received and, if available, the complainant's name and contact information <input checked="" type="checkbox"/> Name of staff responding to the complaint <input checked="" type="checkbox"/> Date the investigation was initiated <input checked="" type="checkbox"/> The outcome of the staff investigation <input checked="" type="checkbox"/> Corrective action(s) taken to eliminate the illicit discharge <input checked="" type="checkbox"/> The responsible party for the corrective action(s) <input type="checkbox"/> The status of enforcement procedure(s), when necessary <input checked="" type="checkbox"/> The date the corrective action(s) was completed and staff who evaluated final compliance <p>If necessary, provide an explanation: After referring an illicit discharge to a jurisdictional authority, ODOT is not typically notified of the status of the enforcement, as ODOT is not the enforcing authority.</p>
<p>61. Briefly describe Routine Maintenance Inspection activities. <i>Schedule A.3.c.v.(A)</i> ODOT inspects its water quality facilities/stormwater structural controls (SSCs) for non-stormwater and illicit discharges during routine maintenance, including but not limited to routine road patrol, catch basin cleaning, and annual SSCs inspections. Inspections are further described in the Post-Construction Stormwater Management section of this report. ODOT's Blue Book provides guidance for maintenance staff, including routine maintenance pollution prevention BMPs and non-stormwater discharge response (contact MOB if illicit discharges are identified). See Sections 2.3-.7 of ODOT's SMPD.</p>
<p>62. Briefly describe Routine Road Patrol activities. <i>Schedule A.3.c.v.(B)</i> Road patrols are conducted by ODOT maintenance workers as drive by inspections of highway features to ensure there are no immediate problems or concerns impacting highway operations. See Section 2.3.4 of ODOT's SMPD.</p>
<p>63. Were any illicit discharges identified during routine maintenance inspections? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>
<p>64. Indicate which of the following dry-weather field screening activities have been performed in the last year: <i>Schedule A.3.c.v</i></p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> General observation <input checked="" type="checkbox"/> Inspection during routine maintenance activities <input checked="" type="checkbox"/> Routine Road Patrol <input checked="" type="checkbox"/> Water Quality Facilities Inspections <p>If necessary, provide an explanation: ODOT conducts road patrols to observe stormwater-related facilities. Road patrols are conducted more frequently in areas of high traffic or of resource concern. Issues are addressed immediately or scheduled appropriately. Screenings occur through routine maintenance inspections, maintenance of infrastructure, and general observations and road patrols allowing ODOT to be more efficient with time. These screenings allow staff to quickly determine whether an illicit discharge is present at a given site.</p>

65. If flow is observed and the source is unknown, provide a brief description of the field investigation and analysis process. *Schedule A.3.c.v.C,D*

ODOT's Blue Book instructs maintenance crews to contact the MOB if impacts from adjacent landowners are observed. In most cases, ODOT will not be the jurisdictional authority for illicit discharges entering its system. The investigation process includes research into potential sources of flow, determination of the jurisdictional authority, and notification and cooperation with that agency (city, county, or state agency).

66. Are all persons responsible for investigating and eliminating illicit discharges and illicit connections into the MS4 appropriately trained to conduct such activities? *Schedule A.3.c.vi*

Yes No

If necessary, provide an explanation:

Illicit discharge training is included with the annual Blue Book training offered to ODOT employees.

3.4 Construction Site Runoff Control

67. Provide a brief summary of the overall progress towards implementation of this control measure. *Schedule A.3.d*

This control measure has been fully implemented. ODOT reduces the discharge of pollutants from construction sites having one or more acres of ground disturbance through its Regional 1200-CA permits. ODOT Technical Advisory GE 12-01(A) outlines the process to provide appropriate erosion control for all construction projects having the potential to cause erosion, including those construction projects not subject to the 1200-CA. The Blue Book, developed and maintained by ODOT in consultation with NMFS, ODFW, and DEQ, specifies BMPs to be used when carrying out maintenance activities that could otherwise have an adverse effect on water quality and other environmental resources. The maintenance activities described in the Blue Book include both maintenance of installed post-construction structural stormwater BMPs (SSCs), as well as stormwater management principles generally. Construction site runoff is also regulated and managed by adhering to requirements set by other permits, including the Clean Water Act (CWA) Section 404 permits; CWA Section 401 water quality certifications (WQCs); and Oregon Department of State Land's (DSL's) Oregon Removal/Fill Permit. See Section 2.4 of ODOT's SMPD.

68. Were the required components in place by the implementation date? *Schedule A.3.d.i*

Yes No (*Implementation date: June 1, 2022*)

69. Did ODOT require erosion controls, sediment controls, and waste materials management controls to be used and maintained at all ground-disturbing projects from initial clearing through final stabilization to reduce pollutants in stormwater discharges to the MS4 from construction sites? *Schedule A.3.d.ii*

Yes No NA

If necessary, provide an explanation: ODOT's Standard Specifications, Section 00280, details the Erosion and Sediment Control Plan (ESCP) minimum requirements for all Project Sites and conditions. Section 00290 regarding environmental protection explicitly describes control of waste materials. The Blue Book includes stormwater BMPs that apply to maintenance activities.

70. Did ODOT require contractors to complete and implement an ESCP for all constructions sites? *Schedule A.3.d.ii*

Yes No NA

If necessary, provide an explanation: ODOT Technical Advisory GE 12-01(A) outlines a process to provide appropriate erosion control for all construction projects having the potential to cause erosion, including those construction projects not subject to the 1200-CA. Construction projects that do not disturb soil, such as signal work, or signage do not require an ESCP. Small projects that are smaller than the one-acre threshold which trigger 1200-CA compliance are still required to provide erosion control plans as a contract condition.

Guidance was updated in 2024 based on new 1200-CA requirements.

71. Describe ODOT's response procedure and actions to ensure compliance with its ground-disturbing construction site runoff program:

ODOT includes ESC requirements as contract requirements. If conditions are not satisfied, ODOT will require the work be performed or payment will not be provided. ODOT's Standard Specifications, Section 00140, Scope of Work, detail the remedies available to ODOT if the contract requirements are not met. Egregious violations will result in stop-work orders that can last until the failures that cause the violations are repaired and cleanup is completed and may result in enforcement action by DEQ. Construction personnel who disregard construction directives may be removed from projects at ODOT's discretion. Section 00280 was updated in 2023 to include corrective action timelines. See Section 2.4 of the SMPD.

72. Does ODOT have NPDES Construction Stormwater Permit coverage under the NPDES Construction Stormwater General Permit (1200-CA or equivalent). *Schedule A.3.d.ii*

Yes No NA

If necessary, provide an explanation: ODOT's Regional 1200-CA permits were updated in 2023. The Permit update required revisions to the Oregon Standard Specifications for Construction, Section 00280, erosion and sediment control. Subsections of the 00280s that are revised are as follows:

- 00280.00 – Scope
- 00280.04 – ESCP on Agency Controlled Lands
- 00280.05 – ESCP on Non-Agency Controlled Lands
- 00280.16(h) – Temporary Sediment Trap
- 00280.16(k) – Active Treatment System
- 00280.30 – ESC Manager
- 00280.41 – Work Restrictions
 - (a) Disturbance Limits
 - (e) Buffers
 - (f) Hauling Material
 - (g) Underground Injection Controls (UIC)
- 00280.42 – Stabilization
 - (a) Soil Exposure Limitations
 - (b) Temporary Stabilization
 - (c) Permanent Stabilization
- 00280.46(h) – Temporary Sediment Trap
- 00280.46(j) – Access Routes
- 00280.62 – Inspection & Monitoring
 - (a) Inspection
 - (b) Rainfall
 - (c) Monitoring Receiving Stream
- 00280.64 – Corrective Actions
 - (a) Corrective Action Timelines
 - (b) Corrective Action Documentation
- 00280.90 - Payment

73. Provide the written specifications that address the proper installation and maintenance of such controls during all phases of construction activity occurring in its coverage area. *Schedule A.3.d.iii*

The Oregon Standard Specifications for Construction, Section 00280 addresses installation and maintenance of ESCs during all phases of construction.

If necessary, provide an explanation: Section 00280 of ODOT’s Standard Specification for Construction have been revised. The redline comparison between 2021 and 2024 can be found here: [Standard Specifications](#)

74. Explain ODOT’s process for reviewing ESCP from every construction project to ensure the plan is appropriate for the site, and determining if implemented as designed will effectively control construction site.

Plans for construction are reviewed for content and appropriateness by subject matter experts at each submittal milestone. ODOT’s [Erosion Control Manual](#) details Contractor Responsibilities and provides guidance regarding revisions to the ESCP in the plan and on the ground, to meet conditions of construction.

75. Describe the conditions under which an inspection is conducted, the frequency of such inspections, how inspections are documented, and how follow-up actions are determined and implemented. *Schedule A.3.d.v*

Inspections are conducted according to the frequency required by the 1200-CA permit and/or ODOT guidance. Revisions to the 00280 Specifications reflect and mirror the inspection requirements identified in the 1200-CA Permit.

76. Provide the written escalating enforcement and response procedure to address violations, through progressively stricter responses supported by contracts held with contractors, to achieve compliance. The procedure must include ODOT’s criteria for self-reporting illicit discharges, and timelines for compliance. *Schedule A.3.d.vi*

ODOT’s Standard Specifications, Section 00140, Scope of Work, details the remedies available to ODOT if the contract requirements are not met.

77. Were all persons responsible for ESCP reviews, site inspections, and enforcement appropriately trained to conduct such activities? *Schedule A.3.d.vii*

Yes No

If necessary, provide an explanation:

ODOT's Environmental Construction Inspector Certification is valid for five years. ODOT's ESC Manager Certification is required to perform ESCP reviews and inspections. The Erosion and Sediment Control Manager (ESCM, <https://www.oregon.gov/odot/construction/pages/escm-cert.aspx>) Certification is valid for five years, ensuring training will occur at least once during the permit term. Both ESCM and Environmental Construction Inspector training content was revised to reflect the changes to the 1200-CA Permit requirements which became effective on April 1, 2023.

Introductory presentations were provided to technical staff in each of the ODOT's Regions to provide guidance on both the development of ESCPs that are Permit compliant, and to introduce Construction staff to the expectations they are now presented with in the more stringent Permit. A presentation was provided at the annual conference of the Association of General Contractors.

ODOT provided certification training for 27 Contractor's ESC Managers as follows:

- 2/14/23; 11 participants
- 3/7/23; 33 participants
- 2024: 27 participants
- 2025: 52 participants

ODOT provided certification training for 52 Certified Environmental Construction Inspectors as follows:

- 2/15 & 2/16/23; 37 participants
- 3/8 & 3/9/23; 37 participants
- 2024; 52 participants
- 2025: 87 participants

3.5 Post-Construction Site Runoff

78. Provide a brief summary of the overall progress towards implementation of this control measure. Schedule A.3.e

This control measure has been fully implemented. The ODOT Hydraulics Manual (HM) provides guidance for designing hydraulic features related to ODOT's transportation system including stormwater management guidance. Specifically, chapters 12 and 14 presents guidance on a) water quantity standard, b) water quality standard, c) SSC design and specifications, and d) the stormwater selection process (i.e., stormwater mitigation options). The hydraulic/stormwater design deviation, Requirement E (allowance for alternative compliance) is covered in chapter 3 of the HM.

ODOT has also developed guidance documents to supplement the HM that provides technical direction and communicate project delivery policies to staff and consultants working on ODOT projects including:

- [PD-05 Post-construction Stormwater Management for Environmental Compliance \(updated 2023\)](#),
- [HE24-01\(B\) Underground Injection Control Systems \(UIC\)](#),
- [GE16-01\(B\) Stormwater Control Facility Operation and Maintenance \(O&M\) Plan Development Drafting Guidance](#), and
- [GE16-02\(B\) Stormwater O&M Manuals – Update](#).

Stormwater technical standards and specifications include several boilerplate special provisions for structural stormwater BMPs: Water Quality Structures (SP01010), Ponds (SP01011), Biofiltration Swale (SP01012), Bioslope (SP01013) and Filter Strip (01014).

These documents are available on the ODOT Oregon.gov webpage:

- <https://www.oregon.gov/odot/hydraulics/Pages/Hydraulics-Manual.aspx>
- <https://www.oregon.gov/odot/hydraulics/Pages/Technical-Guidance.aspx>
- <https://www.oregon.gov/odot/hydraulics/Pages/Specs.aspx>
- <https://www.oregon.gov/odot/hydraulics/Pages/Standards.aspx>

79. Were the required components in place by the implementation date? Schedule A.3.e.i

Yes No (Implementation date: June 1, 2023)

80. Describe efforts to identify, minimize or eliminate barriers within ODOT's legal authority that inhibit design and implementation techniques intended to minimize impervious surfaces and reduce stormwater runoff (Low Impact Development and Green Infrastructure). Schedule A.3.e.iii

ODOT design procedures strongly prefer low impact development (LID) techniques (see HM Chapter 14, Appendix A) because they tend to result in superior environmental outcomes, are preferred by regulatory agencies, are usually easier to maintain in proper working order, and sometimes require no special maintenance. As a result, most ODOT projects required to manage post-construction stormwater runoff successfully employ LID techniques. When ODOT satisfies its stormwater management obligations using non-LID techniques, it's almost always due to physical constraints, singularly or in combination, that are not practicable to overcome. Examples of such constraints include:

- Insufficient distance between the impervious surface and the receiving water;
- Native soils that aren't conducive to infiltration;
- Competing environmental resources such as wetlands, streams, and cultural resources that would have increased impacts as a result of LID implementation that would either be legally not permissible or would render the LID treatment counterproductive;
- Inadequate groundwater separation;
- Vertical head or drop limitations that physically prevent conveying water to LID facilities; and
- Right of way (ROW) limitations (in cases where the potential benefits of treatment are too small to outweigh the high costs of obtaining ROW, rendering ROW impracticable)

ODOT works within these constraints to achieve the reduction of pollutants to the maximum extent practicable.

An internal evaluation was conducted in 2023 to review ODOT policies and practices to determine if barriers existed to the implementation of LID practices and Green Infrastructure (GI) stormwater management facilities. Interviews were carried out with representatives across different departments/section/areas within the agency to gain insight into the types of barriers that may exist within ODOT.

81. Describe any modifications to standards resulting from those efforts.

ODOT continues to look for opportunities to improve the implementation of LID and GI on ODOT projects. The 2023 internal evaluation also looked at opportunities for improving ODOT's implementation of LID and GI training and additional guidance.

82. Indicate which technical standards are included in the Post-Construction Stormwater Management Program, include links and highlight any changes made in the reporting year: *Schedule A.3.e.iv*

- Flow Control Standards (to address hydromodification impacts)
 - [HDM](#) Chapter 12, Section 12.5 Flow Control design criteria, Section 12.5.1.1 Channel Processes Design Storms page 12-12 (Hydromodification)
 - Federal Aid Highway Program (FAHP) in the State of Oregon, Section 29,a,b,c,d.vii-viii
- Water Quality Standard
 - [HDM](#) Chapter 14, Section 14.8
 - Federal Aid Highway Program (FAHP) in the State of Oregon, Section 29,a,b,d.vi
- Structural Stormwater Control Design and Specification
 - Flow Control: [HDM](#) Chapter 12 Sections 12.5.2-12.5.4, 12.9
 - Water Quality: [HDM](#) Chapter 14 Appendix A-F
 - [SP01010](#), Stormwater Control WQ Structures
 - [SP01011](#), Stormwater Control Ponds
 - [SP01012](#), Stormwater Control WQ Biofiltration Swale
 - [SP01013](#), Stormwater WQ Bioslope
 - [SP01014](#), Stormwater WQ Filter Strip
 - [ODOT 2024 Standard Specifications](#)
 - [ODOT Qualified Products List](#), Category: Stormwater Control Facilities, Spec # 01010.03
 - [Operations & Maintenance Manual Templates](#)
 - Stormwater/hydraulic facility [drafting guidance](#)
 - [ODOT CAD Manual](#), Section 513 Major Category "H" – Hydraulic
 - [GHE CAD Manual](#), Part 400
 - [GE16-01\(B\)](#) Stormwater Control Facility O&M Plan Development Drafting Guidance
- Allowance for Alternative Compliance (Deviation)
 - [HDM](#) Chapter 3, Appendix A – [Hydraulic Design Deviation Form](#) (Note, open link with Internet Explorer)
- Stormwater Mitigation Options
 - FAHP Programmatic User's Guide 3.5.5 Off-Site Management and Mitigation
 - FAHP Programmatic User's Guide 3.5.6 Opportunistic Stormwater Treatment Credit Approach

If necessary, provide an explanation: N/A

83. Describe how ODOT reviews and approves project-specific documents and plans for sites that require an engineered stormwater control facility. *Schedule A.3.e.v*

Before initiating construction, ODOT reviews and approves project-specific documents and plans for sites that require an engineered SSC as part of the ODOT Project Development phase. These documents include Hydraulic Reports, Stormwater Reports, Stormwater Management Plans, FAHP Stormwater documentation, and Plans, Specifications and Estimates (PS&E).

The Project Development phase includes the Design Acceptance, Preliminary Plans, Advance Plans, Final Plans, Plans, Specification and Estimates (PS&E), Advertisement and Contract Award, including review of documents and deliverables at each milestone. The Plan Development Phase follows after Design Acceptance and provides detailed information about the expectations, requirements and deliverables for Preliminary Plans, Advanced Plans and Final Plans milestones of project development. Final Plans

includes hydraulics/stormwater reports that documents the design of engineered stormwater control facilities. The PS&E phase prepares the project documents for contracting, including stormwater management facility O&M manuals (if applicable).

ODOT has a template for Stormwater Management Plans and a typical Stormwater Design Report and Hydraulic Report layout in Chapter 4 of the HM.

These documents are available on the ODOT Oregon.gov webpage.

- [Stormwater Management Plan Template](#)
- [SWMP QC Process](#)
- [Project Delivery Guide](#)
- [Hydraulics Manual Chapter 4 Documentation](#)
- After the project contract award, the project transitions to the Construction Management phase for construction.

84. Briefly describe the Long-Term Operation and Maintenance (O&M) strategy for water quality facilities (WQFs): *Schedule A.3.e.vi*

ODOT's Hydraulics and Engineering Section (HES) maintains an inventory of water quality facilities using assigned drainage facility identification (DFI) numbers (unique identification). The Clean Water Coordinator annually contacts district managers and collects WQF maintenance and inspection data. Water quality facilities are typically inspected annually and maintained as needed.

ODOT has developed Standard Maintenance Tables and O&M Manual templates for its water quality facilities. The Standard Maintenance Tables include information regarding recommended maintenance actions for each type of stormwater facility. O&M Manuals are required by the MS4 Permit and the FAHP. Project Delivery staff prepare O&M Manuals with site-specific information on facility O&M for newly constructed water quality facilities. The manuals are provided to maintenance staff upon completion of construction. ODOT is retroactively creating O&M manuals for existing facilities.

85. Does the strategy provide the following elements?

- Inspection procedures and an inspection schedule that comply with O&M requirements for each WQF
- A tracking mechanism for documenting inspections and the O&M requirements, including
- Maintenance documentation
- Requirements to maintain and/or replace vegetation to ensure functionality
- Locations of all stormwater controls installed, viewable through ODOT's public GIS interface

If necessary, provide an explanation: N/A

86. Describe how ODOT ensures that the ODOT employees or contractors responsible for performing post-construction runoff site plan reviews, administrating the alternative compliance program, or performing O&M practices, or evaluating compliance with long-term O&M requirements are trained at least once during the permit term to conduct such activities:

- ODOT's Blue Book training is offered annually to maintenance districts and includes a review of the standard maintenance tables and other tools available to maintenance staff to assist in the O&M of water quality facilities.
- Hydraulic engineer/plan reviewer training (April 2023).
- Annually MOB staff conduct meetings with district manager/coordinator onsite or virtually to provide training and discuss what compliance looks like.

87. Were all persons responsible for performing post-construction runoff site plan reviews, administrating the alternative compliance program, or performing O&M practices or evaluating compliance with long-term O&M requirements appropriately trained to conduct such activities? *Schedule A.3.e.vii*

Yes No

If necessary, provide an explanation: N/A

3.6 Pollution Prevention and Good Housekeeping for Municipal Operations

88. Provide a brief summary of the overall progress towards implementation of this control measure. Schedule A.3.f

This control measure has been fully implemented. ODOT continues to adaptively manage its Environmental Management System (EMS) Program, Spill Prevention Control and Countermeasure (SPCC) Program and other relevant programs to minimize potential impacts to stormwater generated on ODOT-owned facilities. ODOT has developed a GIS map that shows completion of yard EMS audits and additional information (e.g. stormwater treatment, BMPs, pretreatment system, etc.). A preliminary ESRI Survey123 survey has been developed to track SSC inspection and maintenance in ODOT region 2B (Portland area) to improve efficiency and effectiveness.

89. Were the required components in place by the implementation date? Schedule A.3.f.i

Yes No (Implementation date: June 1, 2021)

90. Were O&M strategies for existing controls implemented? Schedule A.3.f.ii

Yes No N/A

If necessary, provide an explanation: N/A

91. Provide a brief summary of the EMS program activities implemented:

The EMS Manual is ODOT's written stormwater management plan for the maintenance yards. The EMS program provides guidance for pollutant source identification in addition to consistent, practical, BMPs for source control and pollutant removal. Program updates were completed in 2009, 2013, 2019, and is almost completed with an update for 2026. The program defines BMPs and benchmarks for managing products and wastes. 6 EMS trainings and 28 EMS audits were completed in 2025.

92. Is the EMS Annual Report included with this Report?

Yes No

If necessary, provide an explanation: The EMS goals that were included in ODOT's Sustainability Plan have been met and updated. The Sustainability Plan does not have new EMS-related goals. There are two decades of data showing ODOT met over 90% of the BMPs for materials management for the 7 priority procedures. Yards continue to be audited and the records are maintained.

93. Provide a brief summary of the catch basin cleaning activities implemented:

Catch basin inspection and cleaning is typically performed on an annual basis. Some areas require more frequent cleaning. District crews are responsible for identifying maintenance requirements.

94. Provide a brief summary of the Integrated Vegetation Management Plan activities implemented:

The ODOT Integrated Vegetation Management (IVM) program is required under Oregon statute ORS 634.660. The program develops agency guidance for managing noxious weeds, landscape plantings, roadside timber, and other vegetation issues associated with ODOT rights-of-way. Goals of the ODOT IVM program include encouraging self-sustaining vegetation and reducing the need for herbicides, fertilizers, and irrigation. ODOT continually explores new vegetation management practices, technologies, and partnerships to improve its IVM program. Primary IVM management tasks completed by ODOT in 2025 include:

- Provided guidance to maintenance on vegetation management techniques and meeting applicable laws.
- Ensured compliance with ODOT's NPDES 2300-A Pesticide General Permit and submitted the required annual report to DEQ.
- Updated ODOT's Pesticide Discharge Management Plan.
- Conducted 5 pesticide trainings.
- Updated USFS Pesticide Use Proposals (PUPs) for 2 districts.
- Hosted 8 Regional Spring Vegetation Management Refresher Trainings (Oregon Department of Agriculture approved) for 95 ODOT applicators.

95. Provide a brief summary of Litter Control activities implemented:

ODOT cleans up litter and debris found along state highways using its own employees (permanent or temporary), contractors, and volunteers. The litter control work is managed individually by District. The Youth Litter Patrol program is designed to involve youth in the cleanup of litter along state highways. Crews usually have a crew leader and two or more crew members and are based in various locations in the state.

Crews work primarily in the summer months. The Adopt-A-Highway program involves volunteers in the clean up of litter along state highways. In 2025, 49 permits for Adopt-A-Highway activities were issued.

96. Provide a brief summary of the Appropriate Materials Disposal activities implemented:

The EMS program coordinator provided guidance on managing materials used in the day-to-day maintenance of the highway system.

- An update to the EMS manual is almost complete and will be distributed to all of the maintenance crews by mid-year.

97. Were all persons responsible for evaluating O&M practices, evaluating compliance with long-term O&M requirements or ensuring pollution prevention at facilities and during operations appropriately trained to conduct such activities? *Schedule A.3.f.v*

Yes No

If necessary, provide an explanation: N/A

4.0 Winter Maintenance Program

98. Provide a brief summary of the overall progress towards implementation of this control measure. Schedule A.3.e

The control measure has been fully implemented. ODOT's Winter Maintenance Program was developed to limit water quality impacts from winter maintenance activities. Winter maintenance materials are stored and applied in conformance with BMPs outlined in the ODOT EMS Manual and Maintenance Guide. Application BMPs are outlined in the Maintenance Guide. During EMS audits, ODOT staff visually inspect storage areas. Additional details are provided in the Winter Maintenance Annual Report.

Region 5 launched a salt brine program to add another tool for winter storm road treatment. Brine dries out the road (rather than absorbing moisture like magnesium chloride) and can be less expensive than some other deicer materials. A salt brine maker was installed at the La Grande maintenance yard to help try to keep eastern Oregon roads safer and more predictable during storms. This new system gives crews more flexibility in storm preparation and another alternative to magnesium chloride or solid salt. The new equipment is a result of a brine pilot project out of Region 1, District 2B where careful after storm evaluations and discussions were completed over almost a 2-year period.

99. Were the required components in place by the implementation date? Schedule A.3.g.i

Yes No (Implementation date: June 1, 2022)

100. Describe how ODOT utilizes its EMS program to ensure that winter materials (including solid salt, deicers including but not limited to magnesium chloride [MgCl₂], and abrasives) are stored properly:

Winter maintenance materials are stored and applied in conformance with BMPs outlined in the ODOT EMS Manual and Maintenance Guide. During EMS audits, ODOT staff visually inspect storage areas.

101. Describe how ODOT utilizes the Blue Book to ensure proper use of these materials:

Winter maintenance BMPs are outlined in the Blue Book, and address plowing practices, application BMPs, recordkeeping, calibration, and material purchasing.

102. Was the Winter Maintenance Strategy updated during the permit term?

Yes No

103. Is a copy included with this Report?

Yes No

If necessary, provide an explanation:

104. Is the Winter Maintenance Annual Report included with this report?

Yes No

If necessary, provide an explanation: The Winter Maintenance Annual Report is available upon request.

105. Has ODOT implemented research of best management practices related to the management and application of winter maintenance materials?

Yes No

If necessary, provide an explanation: See #98.

5.0 Stormwater Retrofit Strategy
<p>106. Provide a brief summary of the overall progress towards implementation of this control measure. <i>Schedule A.3.h</i> ODOT's Stormwater Retrofit Strategy Document was provided to DEQ in 2024.</p>
<p>107. Were the required components in place by the implementation date? <i>Schedule A.3.h.i</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> (<i>Implementation date: June 1, 2024</i>) If necessary, provide an explanation: N/A</p>
<p>108. Describe the progress toward developing ODOT-defined set of stormwater quality retrofit objectives and range of retrofit control measures: A retrofit strategy has been developed to identify retrofit objectives and prioritize retrofit opportunities. A Working Group was established to evaluate and select retrofit projects.</p> <p>109. Describe how these objectives prioritize progress toward improving water quality: ODOT's retrofit strategy prioritizes water quality improvement through treatment of the entire contributing impervious area (CIA) of ODOT projects and local agency projects implemented through ODOT. Additionally, ODOT is contributing toward a large retrofit project in the Portland Harbor area that will install 25 new stormwater control measures to treat an approximately 81 acres of CIA.</p>
<p>110. Is the Stormwater Retrofit Strategy Document included with this Report? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If necessary, provide an explanation: The Stormwater Retrofit Strategy Document was provided to DEQ in 2024.</p>

6.0 Monitoring
<p>111. Was monitoring completed in accordance with the most recent Monitoring Plan? <i>Schedule B.2</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If necessary, provide an explanation:</p>
<p>112. Is the monitoring data submitted with this report? <i>Schedule B.2</i> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If necessary, provide an explanation: In 2024 ODOT submitted monitoring data to DEQ from 6 different sampling events associated with PDX Harbor.</p>

7.0 MS4 Data Compilation
<p>113. Provide a brief summary of the overall progress towards implementation of this control measure. <i>Schedule D.1</i> ODOT's MS4 data compilation and a description of the digital inventory and a gap analysis was provided to DEQ in 2024.</p>
<p>114. Were the required components in place by the implementation date? <i>Schedule D.2.i</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> (<i>Implementation date: June 1, 2024</i>) If necessary, provide an explanation: N/A</p>
<p>115. Does the digital inventory include:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Location and physical characterization of all available outfalls, conveyance systems, and stormwater control locations collected by ODOT or consultants contracted by ODOT since 1999? <input checked="" type="checkbox"/> Any and all available monitoring data collected by ODOT or consultants contracted by ODOT since 1999? <input checked="" type="checkbox"/> Tracking information related to water quality control measures in this digital inventory? <input checked="" type="checkbox"/> Any additional data for characterizing the ODOT MS4? <p>If necessary, provide an explanation: N/A</p>

<p>116. Are the priority locations identified in ODOT’s Retrofit Program Strategy Document included in the digital data? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If necessary, provide an explanation: N/A</p>
<p>117. Describe ODOT’s work to identify where geographic or subject-area gaps in data exist: During the permit term, ODOT staff have compiled and reviewed all location data, monitoring data, tracking information and research data.</p>
<p>118. Is the summary included with this Report? <i>(Due with the fourth MS4 Annual Report or June 1, 2024)</i> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If necessary, provide an explanation: N/A</p>
<p>119. Has ODOT consulted with DEQ to prioritize how to address the identified geographic-, subject-, or pollutant-specific gaps in information? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Work has been completed.</p>
<p>120. Has the following winter maintenance data, where possible, pertaining to winter maintenance been included in the digital data?</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Location of maintenance yards and structures containing winter maintenance materials; <input checked="" type="checkbox"/> Locations of use of winter maintenance materials; <input checked="" type="checkbox"/> Quantities used in relation to distance (e.g., pounds per mile); <input checked="" type="checkbox"/> Other potentially useful information found through research topics that will help improve water quality related to Oregon’s transportation system?
<p>121. Describe any research topics ODOT has implemented that will help improve water quality related to Oregon’s transportation system: In 2025, ODOT continued to lead the Federal Highway Administration (FHWA) pooled fund to study 6PPDQ and pursue the following goals:</p> <ol style="list-style-type: none"> 1. Characterize the occurrence, and transport of 6PPDQ in highway stormwater runoff within highway catchments under varying hydrologic conditions. 2. Assess the fate of 6PPDQ in stormwater runoff by assessing effectiveness of existing and modified stormwater BMPs in reducing 6PPDQ concentrations. 3. Develop and evaluate alternative detection strategies, including potential field-deployable methods and proxies. 4. Identify key roadway characteristics (e.g., pavement type, traffic density) that influence 6PPDQ mobilization. 5. Provide DOTs with scientifically defensible data to inform stormwater management practices and regulatory compliance.
<p>8.0 Index of Attachments</p>
<ol style="list-style-type: none"> 1. Stormwater Management Program Document (SMPD) 2. IDDE Tracking Spreadsheet 3. TOC Spills Report
<p>9.0 Documents Available Upon Request</p>
<ol style="list-style-type: none"> 1. 2025-26 Winter Maintenance Report (complete summer 2026)