

ALDOT and the City of Daphne to monitor D'Olive Creek in Daphne have been fruitful, encouraging ALDOT to pursue partnerships with other MS4s in the future.

C. Program Strengths & Weaknesses

ALDOT considers its well-established MS4-applicable activities to be noteworthy strengths of its SWMP. In particular, education of employees, education of the public, involvement with the public, construction stormwater management, and PPGH for transportation facilities are typically conducted in highly proficient manners and usually achieve expected outcomes and even outcomes beyond those required by the Permit. The IDDE program is gaining strength as the successful field implementation of major outfall inventory and screening continues. With formalization of PPGH procedures for ALDOT support facilities, the official documentation now exists for effective practices already in place at the support facilities.

ALDOT's MS4 Monitoring program is indeed more sensible than monitoring efforts conducted under previous MS4 permits, but the biases in the monitoring data collected, discussed above in Section II.H, make the data less meaningful than desired and continue to motivate ALDOT to explore ways of better preserving the integrity of data, if possible, so that viable conclusions can be drawn. The Post-Construction Stormwater Management program implementation has been smooth overall to date, but the implementation has only applied to the design phase of projects thus far; field implementation of post-construction BMPs will be needed to adequately gauge the effectiveness of the program.

D. Overall Program Effectiveness

Despite limited field implementation data, the ALDOT SWMP shows potential for long-term effectiveness. This assessment is based on the success of the implemented aspects of the program and the progress made through the end of FY 2016 with respect to the development of other aspects of the program.

Highlighting the general effectiveness of ALDOT MS4 program components working together is an account in *A Naturalist Goes Fishing* by James McClintock, published during FY 2016. McClintock provides the reader with insight of ALDOT's construction stormwater management and involvement with the public during the design and construction of a segment of the Birmingham Northern Beltline near Self Creek. He explains the collaboration in which ALDOT engaged with environmental advocates such that an agreement about stream protection goals among all parties was achieved prior to the start of construction in the field, the robust construction stormwater practices ALDOT employed in the field, and the high degree of effectiveness of those practices as perceived by the advocates.

IV. Future Direction of the Program

In general, ALDOT will continue to conduct activities as indicated in the SWMPP, given the progress that largely met expectations during FY 2016 and the absence of significant setbacks.