

Maui Storm Water Management Program Plan Public Outreach and Training Strategy



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1 INTRODUCTION

This Public Outreach and Training Strategy provides the framework for public outreach and training for the State of Hawaii Department of Transportation Highways and Harbors Division Maui District (Maui District) Storm Water Management Program (SWMP) Plan. This strategy is a supplement to the [Maui Storm Water Management Plan](#) as described in Section 1.2.2 of that document. Maui District is responsible for overseeing the elements of this strategy.

1.1 PURPOSE

This Public Outreach and Training Strategy is to support and further clarify the goals set forth in the Maui District SWMP. This document will provide a framework for outreach and training for the duration of the permit. Like the SWMP, this strategy is a roadmap that can be adjusted and changed over time to ensure that public outreach and training activities support the goals of the SWMP and fulfill the requirements of the small MS₄ permit.

1.2 PERMIT REQUIREMENTS

With regard to public education and outreach, Part 6.(a)(1) of Appendix K of the State of Hawaii's NPDES General Permit (HAR 11-55) requires an operator of a regulated small MS₄ to:

Develop and implement a public education program to distribute educational materials to users of the permittee's small municipal separate storm sewer system or equivalent outreach activities emphasizing the following:

- (A) Impacts of storm water discharges on water bodies,*
- (B) Hazards associated with illicit discharges, and*
- (C) Measures that users of the permittee's small municipal separate storm sewer system can take to reduce pollutants in storm water runoff, including, but not limited to, minimizing fertilizer application and practicing proper storage and disposal of chemicals and wastes*

With regard to public involvement and participation, Part 6.(a)(2) of Appendix K of the State's General Permit (HAR 11-55) requires an operator of a regulated small MS₄ to:

Include users of the permittee's small municipal separate storm sewer system in developing, implementing, and reviewing the storm water management plan

1.3 ORGANIZATION OF THIS DOCUMENT

Chapter 1 of this document provides an overview of the purpose of this strategy document. Chapter 2 describes the different recipients of public outreach and training. Chapter 3 lists the key message of the public education program as well as key second level messages for particular audiences identified in Chapter 2. Chapter 4 describes the outreach strategy. Chapter 5 describes the training strategy. Chapter

6 describes the adaptive management approach and how public involvement plays a role in refining the Maui District SWMP Plan. Chapter 7 describes metrics that will be used to refine the training and public outreach programs.

2 AUDIENCES

Maui District has defined the term users to include those who perform work upon, perform work adjacent to, or use the HDOT roadways and facilities included in the Maui District MS4 network. Table 2-1 summarizes various types of users along with their primary activities as it relates to this SWMP. The following primary activities have been identified:

- Driving – Those who drive on roadways, but do not necessarily perform other activities within or adjacent to HDOT rights-of-way.
- Non-Storm Water Discharger – Those who have the potential to generate non-storm water discharges listed in HAR 11-55, Appendix K, Part 1.(a), but do not necessarily perform other activities within or adjacent to HDOT rights-of-way.
- Road Work – Those who perform road work within and adjacent to HDOT rights-of way.
- Landscaping – Those who perform landscaping work within and adjacent to HDOT rights-of-way.
- Harbors Activities – Those who regularly perform work at the Kahului harbor

The emphasis areas of outreach and education are based on HAR 11-55, Appendix K, Part 6.(a)(1). A summary of possible audiences is included in table 1-1 in the SWMP.

2.1 MAUI RESIDENTS AND GENERAL PUBLIC

The audience for this public education program would be all users of the State Highway system and the State Harbor in the Kahului area as indicated in Table 2-1. Maui residents, specifically those living in Kahului, are the primary target audience for storm water awareness and education. Those that commute from other islands and tourists would also be considered as part of the target audience.

2.2 INDUSTRIAL AND COMMERCIAL FACILITIES

Commercial and Industrial facilities have a high potential to generate non-storm water discharges, which are authorized under the general permit. These authorized discharges are described in HAR 11-55, Appendix K, Part 1.(a):

This general permit covers storm water and certain non-storm water discharges, provided they do not cause or contribute to any violation of water quality standards, to state waters from municipal separate storm sewer systems.

Non-storm water discharges authorized by this general permit, provided that they do not cause or contribute to any violation of water quality standards, include:

1. *Water line flushing;*
2. *Landscape irrigation;*
3. *Diverted stream flows;*
4. *Rising ground waters;*

5. *Uncontaminated ground water infiltration;*
6. *Uncontaminated pumped ground water;*
7. *Discharges from potable water sources and foundation drains;*
8. *Air conditioning condensate;*
9. *Irrigation water;*
10. *Springs;*
11. *Water from crawl space pumps and footing drains;*
12. *Lawn watering runoff;*
13. *Water from individual residential car washing;*
14. *Flows from riparian habitats and wetlands;*
15. *Dechlorinated swimming pool discharges;*
16. *Residual street wash water; and*
17. *Discharges or flows from firefighting activities.*

Residential locations that generate the types of non-storm water discharges described above are already included as an audience as described in Section 2.1. Commercial and Industrial facilities which generate the types of non-storm water discharges are of particular interest as an audience since these facilities have a direct impact on the MS₄ and as such need to understand best management practices related to storm water. Depending on their Standard Industry Code (SIC), some Industrial facilities are required to have a NPDES permit and are thus included as NPDES permit holders listed in Section 2.3.3.

2.3 PERMIT HOLDERS

Maui District currently administers a permitting program for any individual, business, or agency that wishes to establish a temporary or permanent physical connection to and/or discharge storm water runoff into the Maui District MS₄. Permittees have a direct effect on the quality of waters discharged to the MS₄, therefore public outreach to these permittees is an important opportunity to prevent pollutants from entering State Waters by educating dischargers on the importance and consequences of certain behaviors.

2.3.1 CONNECTION/DISCHARGE PERMITS

Connection/discharge permits can be tracked through the application process. A connection permit is required whenever a physical connection is proposed to be made with the Maui District MS₄. For instance, a connection permit is required when a shopping center wishes to connect their drainage system to the District MS₄. A discharge permit is required when there is a potential for a discharge into the District MS₄ from a discrete source such as a HDOT managed construction site or a commercial parking lot via sheet flow. As such, connection and discharge permits share many of the same requirements and differ primarily in the type of connection being made to the MS₄. The purpose of both is to provide a formal means of ensuring that discharges associated with significant sources of storm water are compliant with the regulations of the District MS₄ permit. These connections may be temporary or permanent in nature.

2.3.2 ENCROACHMENT PERMITS

Encroachment permits are for non-HDOT construction projects that occur within the HDOT right-of-way (ROW) – such as utility connections for new development. They are handled a little differently than HDOT construction projects since NPDES coverage for non-HDOT projects are usually not obtained by HDOT even though they can affect the HDOT MS₄ (see Section 2.3.3). Encroachment permits are temporary in nature.

2.3.3 NPDES PERMITS

The Clean Water Act mandates any individual, agency, business or organization, including HDOT, to obtain NPDES coverage for particular construction activities and particular categories of industrial facilities.

- Construction activities that disturb one (1) acre or more of land area, or result in the discharge of dewatering or hydrotesting effluent into State waters require NPDES Permit coverage. HDOH administers the NPDES Program for the State, and requires submittal to HDOH of a Notice of Intent (NOI) to obtain a Notice of General Permit Coverage (NGPC), or an individual permit application. A Storm Water Pollution Prevention Plan must be also prepared as a requirement of NPDES compliance. As the owner of a small MS₄, Maui District's own MS₄ Permit requires HDOT to verify that any third party or Applicant seeking to discharge into its MS₄ has obtained an NPDES permit, if applicable. Connection/Discharge and Encroachment Permit Holders who are also NPDES permittees represent a subset of a targeted audience with specific training needs.
- Industrial facilities under Standard Industrial Classification (SIC) categories listed in the Hawaii Revised Statutes (HAR) 11-55 B are regulated for storm water discharges and required to obtain an NPDES permit. These facilities are required to have an NPDES permit because their typical activities represent a greater than normal risk of water pollution.

2.3.4 HARBORS REVOCABLE PERMITS

Kahului Harbor users may request the use of specific areas within the harbor proper and if approved may receive a harbors revocable permit. Holders of these permits have regular operations at the harbor and thus due to their proximity to the harbor warrant special focus. These permits are usually semi-permanent in nature, but can be revoked with 30 days' notice.

2.4 MAUI DISTRICT

Maui District staff who perform and oversee construction and maintenance work within Maui District ROW need to be aware of the storm water regulations that apply to their projects. Regular training for Maui District construction and maintenance staff is necessary to keep Maui District up-to-date with the latest in storm water regulations and best practices.

Construction and service contractors performing work on behalf of HDOT are included here because they may be considered an extension of HDOT staff.

3 KEY MESSAGES

The key message of the program is “Mālama I Ka Wai” which in English means Protect Our Water. The intent of this message is that our water resources are precious and that each of us can and should be a part of protecting them. The message is in Hawaiian to communicate a sense of the unique environment, culture and history of our island home.

The particular application of the core message differs depending on the audience and activity being discussed. Table 3-1 lists second level key messages by audience.

TABLE 3-1: KEY MESSAGES BY AUDIENCE	
Audience	Application Message(s)
Residents / General Public	<ul style="list-style-type: none"> • Together we can make a difference • Best Practices to reduce pollutants from entering the storm drain - Recycling, Proper Disposal of Household Hazardous Waste, etc.
Commercial / Industrial Facilities / Harbors Users	<ul style="list-style-type: none"> • Awareness of storm water regulations and permits that apply to commercial and industrial facilities • Install and maintain proper BMPs for Commercial and Industrial facilities
Permit Holders	<ul style="list-style-type: none"> • Be aware of your permit requirements • Install and maintain proper BMPs
HDOT Staff	<ul style="list-style-type: none"> • Be a storm water leader (a model for others) • Caring for the environment is an important part of HDOT staff’s work
Contractors	<ul style="list-style-type: none"> • Environmental aspects of a project need to be managed properly • Install and maintain proper BMPs

Since HDOT Harbors Division has its own branding, materials developed specifically for Harbors staff and harbor users will use the Harbors key message which is “Mālama I Ke Kai”, or in English “Protect Our Harbor Waters.”

As the understanding of each particular audience matures, these second level key messages are expected to change to encourage deeper participation in storm water pollution protection.

4 OUTREACH STRATEGY

The purpose of the Public Education and Outreach Program is to teach and train HDOT staff and the public on what they can do to reduce pollutants in storm water in their daily activities.

4.1 OUTREACH ACTIVITIES

Outreach activities may include meetings, presentations, programs and event booths where participants are given educational material and engaged in activities or discussion about the Maui District MS₄ and SWMP.

4.1.1 MEETINGS

Meetings with agencies, partners (see Section 4.3), and other MS₄ Users.

4.1.2 PRESENTATIONS

Presentations may be developed to communicate key messages to the audiences whenever a presentation format is appropriate.

4.1.3 PROGRAMS

4.1.3.1 *ADOPT-A-HIGHWAY*

The Adopt-A-Highway Program will continue to be managed as a means of both reducing storm water pollution as well as engaging and educating the public.

4.1.3.2 *ILLICIT DISCHARGE PROGRAM*

The Illicit Discharge Program will have an outreach component focused on pollution prevention practices that will avoid or minimize illicit discharges from occurring in the community. Program elements focused on neighborhood discharges could include storm drain stenciling, lawn care, septic system maintenance, vehicle fluid changing, car washing, household toxins waste disposal, and swimming pool draining. Program elements targeting generating sites could include business outreach, spill prevention and response planning, employee training, and site inspections.

4.2 EDUCATIONAL MATERIAL

Educational material provides information in a format that allows broad distribution to a large audience. Material can not only be used actively during outreach activities, but also handed out during presentations and given individually to people interested in certain topics. Along with educational material, logo branded giveaway items go home with people where they can be placed on a refrigerator, kept in the car, or even used at the market (e.g., magnets, litter bags, and tote bags). Materials may be branded with a storm water URL where more information can be found.

4.2.1 STATEWIDE MATERIAL

Educational and promotional material was developed for HDOT Oahu District. Maui District will coordinate with Oahu District to use these items, as practicable.

4.2.2 MAUI SPECIFIC MATERIAL

Existing material will be evaluated against Maui District needs to determine if any information specific to Maui should be developed.

4.2.3 TRAINING MATERIAL

As needed, training material will be made available for each of the component program trainings. Some of this material could be placed on the internet and made available to those who are not able to attend trainings or need material to train subcontractors and additional staff. Section 5 provides more detail about the availability of material for each type of training.

4.3 PARTNERSHIPS

Maui District will pursue partnerships with agencies, businesses, and organizations to enhance its program goals.

Possible partnership entities could include:

- Holders of other MS₄ Permits, such as Maui County
- Commercial businesses and developments located within the MS₄, such as the Queen Kaahumanu Center.
- Businesses that hold connection permits to the Maui District MS₄.
- Businesses that have potential to discharge toxic or hazardous material to the Maui District MS₄, such as gas stations.

Partnership opportunities could include:

- Joint development of outreach material, such as brochures.
- Joint booths and advertisements at events to reduce costs.
- Links, downloads, and/or media announcements on each other's websites.
- Storm water related public service announcements (PSA) on the television, radio, or newspaper.

4.3.1 MEDIA

A program website and possibly social media, television, newspapers, or magazines could be used to promote programs and share information with the broader public. Partnerships could help in promoting Maui District's program messages by getting the message out through partners who are already established in the media.

4.3.2 EVENTS

Informational booths located at events such as a Farmer's Market, campus fair, school fair or other similar event would allow the dissemination of the storm water awareness message to targeted audiences.

4.3.3 MATERIAL

In addition to the material developed by HDOT (see Section 4.2.1), coordination with other MS₄ Permit holders will be initiated so that an evaluation of all available material can be made to determine what could be used by multiple entities. Partnerships with agencies having similar messages could result in sharing the cost of developing, printing, and/or distributing material.

5 TRAINING STRATEGY

The following sections describe the various Maui District SWMP Plan component programs and the training elements for each.

5.1 CONSTRUCTION SITE RUNOFF CONTROL

The objective of the Construction Site Runoff Control Program (Construction Program) is to minimize the potential for polluted storm water runoff from construction sites to enter into the MS₄ and ultimately discharge into State receiving waters.

5.1.1 TRAINERS

The training for this program will be conducted by someone who is experienced in construction best management practices.

5.1.2 AUDIENCE

The training audience includes Maui District maintenance and construction staff as well as contractors who perform work on behalf of Maui District.

5.1.3 METHOD AND MATERIAL

This training will focus on practical field training supported with classroom style training when appropriate.

5.2 ILLICIT DISCHARGE PROGRAM

The objectives of the Illicit Discharge Detection and Elimination Program (Illicit Discharge Program) are to detect and eliminate illicit discharges, as well as to remove illegal connections to the Maui District MS₄. Training is an important element of the Illicit Discharge Program because it ensures that personnel responsible for conducting inspections and/or managing the Maui District MS₄ Database are knowledgeable in the process of detecting, eliminating, and preventing illicit discharges or illegal connections.

5.2.1 TRAINERS

This training will be conducted by experienced personnel.

5.2.2 AUDIENCE

The training audience includes Maui District maintenance and construction staff who have illicit discharge responsibilities.

Local design and construction firms would also be included as an audience with regard to connection permits and the required BMPs (See Section 5.3).

5.2.3 METHOD AND MATERIAL

The training program will consist of a combination of existing EPA-produced Illicit Discharge Program Training webinars, classroom-style training on a variety of topics conducted by on-site trainers, and on-the-job training involving actual field investigations of potential illicit discharge sites that will have been identified in the desktop study portion of the Illicit Discharge Program.

5.3 POST-CONSTRUCTION SWM PROGRAM

The Post-Construction Storm Water Management involves the installation of appropriate permanent BMPs for certain projects as described in the SWMP Section 5.1.1. Permanent BMPs are designed to be installed and remain in place to provide for long-term storm water quality or quantity control.

Maui District personnel with project design and construction storm water responsibilities will receive training on the selection, installation, and maintenance of permanent BMPs. Since most design work for Maui District is done on Oahu, Maui District will participate in Post-Construction BMP training offered on Oahu.

Appropriate resources, guidance, and information regarding Post-Construction BMP selection, installation and maintenance as well as related State project procedures will be made available to contractors who perform design work for HDOT.

5.3.1 TRAINERS

The training will be conducted by experienced personnel.

5.3.2 AUDIENCE

The training audience includes Maui District maintenance and construction staff and design firms.

5.3.3 METHOD AND MATERIAL

The training method for Maui District staff will be determined by the Oahu SWMP program which has historically been a classroom/seminar style with speakers. Training for connection permit holders may include handouts, providing the Permanent BMP manual, and/or office or on-site visits.

5.4 DEBRIS CONTROL PROGRAM

The Debris Control Program falls under the Maintenance section of the Good Housekeeping and Pollution Prevention Program. The focus of these trainings will include best practices, when needed, and record keeping protocols.

5.4.1 TRAINERS

The training for this program will be conducted by someone who is experienced in pollution prevention and best management practices. This training could be combined with other training, such as Construction Activities Training.

5.4.2 AUDIENCE

The training audience includes Maui District maintenance and construction staff.

5.4.3 METHOD AND MATERIAL

Debris control training will be included in Construction BMP training for contractors' construction staff and also in Facility Maintenance training for maintenance staff.

5.5 CHEMICAL APPLICATION PROGRAM

Chemical Application training will consist of instructing landscape maintenance personnel that handle or have responsibility for using fertilizers and herbicides about good housekeeping procedures, such as cleaning and maintaining equipment; properly storing and disposing of chemicals; and general procedures for applying herbicides. The training will focus on behaviors that will prevent contamination of storm water runoff. The training for this BMP will include proper maintenance of vegetative cover and instruction on adjusting irrigation systems to suit site conditions.

5.5.1 TRAINERS

The training for this program will be conducted by personnel with experience in the proper handling of chemicals. This training could be combined with other training, such as Maintenance Facilities Training.

5.5.2 AUDIENCE

Training will target HDOT personnel, including supervisors, employed by HDOT staff or service contractors (e.g., landscaping construction and maintenance contractors) involved in the use, storage, management, and application of herbicides. No person will be allowed to apply herbicides within HDOT rights-of-way or its other properties unless the applier has first received this training.

5.5.3 METHOD AND MATERIAL

Chemical Applications Training for Maui District staff will be performed as a part of Facility Maintenance training. Service contractors will be trained in separate sessions or on an individual basis.

5.6 FACILITY MANAGEMENT PROGRAM

Maintenance and baseyard facilities have the potential to pollute storm water runoff passing through these properties because these are the locations where HDOT parks many of its vehicles and equipment; conducts washing, fueling and maintenance of these vehicles and equipment; and stores materials and chemicals used to maintain its highway network. The goal of the Pollution Prevention/Good Housekeeping Program is to operate Maui District's baseyards in a manner that would prevent impacts to the quality of receiving water bodies to the maximum extent practicable.

5.6.1 TRAINERS

The training for this program will be conducted by someone who is experienced in facility pollution prevention and best management practices.

5.6.2 AUDIENCE

The training audience includes Maui District maintenance and construction staff.

5.6.3 METHOD AND MATERIAL

The training will include a mixture of classroom/seminar style with speakers and on-the-job training with actual equipment and material.

5.7 TRAINING SESSION BREAKOUT

The Maui District MS₄ training program will cover a wide range of key topics. In order to achieve meaningful results and at the same time keep the number of training sessions manageable, the program will focus on sessions designed to give each audience grouping the training they need. A proposed training structure is summarized in Table 5-1 below. The breakout of sessions may vary from the proposed structure in any given year and is expected to change over time as training objectives change.

TABLE 5-1: TRAINING SESSIONS			
Session	Audience	Program	Topics
Construction BMP Training	<ul style="list-style-type: none"> • HDOT Contractors • HWY-M Project Managers • HWY-M Engineers • HWY-M Inspectors • Design Consultants • Encroachment project staff 	<ul style="list-style-type: none"> • Construction Site Runoff Control • Post-Construction SWM Program 	<ul style="list-style-type: none"> • Brief discussion of potential environmental impacts associated with storm water runoff • Development of Site-Specific BMP Plans/Storm Water Pollution Prevention Plans • BMP plan implementation and maintenance • Inspection of BMPs • Enforcement policies • Installation, operation and maintenance of storm water treatment controls • Maintenance of permanent BMPs

TABLE 5-1: TRAINING SESSIONS			
Session	Audience	Program	Topics
<p>Post-Construction BMP Training (Since design is done on Oahu – this training may not be offered on Maui)</p>	<ul style="list-style-type: none"> • HWY-M Engineers • Design Consultants • HDOT Contractors • HWY-M Project Managers • Connection Permit Holders 	<ul style="list-style-type: none"> • Post-Construction SWM Program 	<ul style="list-style-type: none"> • List of required permits, implementing agencies, fees, overviews, trigger, timelines • Selection, design, installation, operation and maintenance of storm water treatment controls • Brief discussion of potential environmental impacts associated with storm water runoff • Potential enforcement actions for non-compliance • Permanent BMP Manual and the Design Checklist Tool • Maintenance of permanent BMPs
<p>Maintenance/Baseyard Training</p>	<ul style="list-style-type: none"> • HWY-M Maintenance Staff • HAR-M Maintenance Staff • Service contractors 	<ul style="list-style-type: none"> • Construction Site Runoff Control • Post-Construction SWM Program • Debris Control Program • Facility Management • Maintenance - Chemical Application Program • Illicit Discharge Detection 	<ul style="list-style-type: none"> • Brief discussion of potential environmental impacts associated with storm water runoff • BMP maintenance • Inspection of BMPs • Maintenance of permanent BMPs • Street sweeping and drain inlet cleaning policies and procedures • Storm Water Pollution Control Plans • Pollutant management • Spill prevention and response • Reporting • Inspection • Proper application and use of chemicals • Awareness of IDDE issues and what to look for

TABLE 5-1: TRAINING SESSIONS			
Session	Audience	Program	Topics
Chemical Application	<ul style="list-style-type: none"> Landscaping Contractors 	<ul style="list-style-type: none"> Maintenance - Chemical Application Program 	<ul style="list-style-type: none"> Proper application and use of chemicals
Illicit Discharge Detection and Elimination	<ul style="list-style-type: none"> Inspectors Connection Permit Holders (Separate session from HDOT staff training) 	<ul style="list-style-type: none"> Illicit Discharge Detection and Elimination 	<ul style="list-style-type: none"> Information and awareness of the Maui District MS4 NPDES Permit, Connection/Discharge Permits, and the overall Maui District SWMP Information and awareness of the important role that Maui District staff serves in protecting the water quality in the State Environmental background and regulatory requirements; Highway responsibilities for storm water management Types of facilities covered by the NPDES general permit for industrial storm water, and other applicable NPDES permit BMPs and other control measures for industrial and commercial facilities to control storm water pollution Identifying and eliminating illegal connection, illicit discharges and spills to the Maui District MS4 Inspection and enforcement techniques

6 SWMP INVOLVEMENT/PARTICIPATION

The Maui District SWMP is the framework within which Maui District will operate to meet program goals. When available, public feedback will be considered during the development of program components of the Maui District SWMP.

6.1 ADAPTIVE MANAGEMENT APPROACH

Maui District has adopted an adaptive management approach to its storm water program, with this document serving as a starting point for the implementation of programs specifically targeted at meeting the requirements of HAR 11-55, Appendix K. The goal of this ongoing, iterative management process is to achieve incremental improvement through the evaluation of collected information. Program objectives, activities, and process will be continually refined with input from stakeholders in order to create meaningful environmental outcomes.

Resource constraints may require prioritization of Maui District SWMP activities so that efforts can be focused on program elements where water quality improvements can be achieved cost-effectively. However, while prioritization may result in decisions and choices made in the selection of which BMP activities to emphasize, complying with the Maui District MS₄ NPDES Permit requirements will ultimately govern.

6.2 SWMP IMPLEMENTATION

During the implementation of the Maui District SWMP, key MS₄ users have been identified. These are the people who carry out the program elements and have a role in determining the success or failure of the program. Providing opportunities for them to review, comment, and suggest ideas about the Maui District SWMP programs during the implementation phase will help to improve operations and refine the programs over time.

6.3 SWMP REVIEW

Involving the key MS₄ users throughout the course of development and implementation of the Maui District SWMP gives everyone the opportunity to be a part of the review process for plans, procedures, and other documents that Maui District develops.

7 MOVING FORWARD

As the strategies move forward, the overall success of the Maui District Storm Water Management Program's Public Education and Outreach Program could be measured by the success of each component program as indicated by:

- general storm water awareness gauged through periodic surveys,
- involvement numbers from public education and training events,
- the amount of educational materials given out,
- the number of storm drains stenciled,
- feedback related to core message comprehension gained from public education events,
- and feedback from trainings and permit reviews.

This Public Outreach and Training Strategy is designed to evolve into an implementation manual that will continue to move the program forward into the next NPDES MS₄ Permit term.