



Illinois Environmental Protection Agency

Bureau of Water • 1021 N. Grand Avenue E. • P.O. Box 19276 • Springfield • Illinois • 62794-9276

Division of Water Pollution Control ANNUAL FACILITY INSPECTION REPORT

for NPDES Permit for Storm Water Discharges from Separate Storm Sewer Systems (MS4)

This fillable form may be completed online, a copy saved locally, printed and signed before it is submitted to the Compliance Assurance Section at the above address. Complete each section of this report.

Report Period: From March, 31, 2020 To March, 31, 2021

Permit No. ILR40 00256

MS4 OPERATOR INFORMATION: (As it appears on the current permit)

Name: County of Champaign, Illinois Mailing Address 1: Brookens Administrative Center
Mailing Address 2: 1776 East Washington Street County: Champaign
City: Urbana State: IL Zip: 61802 Telephone: 217 384 3708
Contact Person: John Hall, Director of Planning & Zoning Email Address: jhall@co.champaign.il.us
(Person responsible for Annual Report)

Name(s) of governmental entity(ies) in which MS4 is located: (As it appears on the current permit)

Champaign County, Illinois

THE FOLLOWING ITEMS MUST BE ADDRESSED.

A. Changes to best management practices (check appropriate BMP change(s) and attach information regarding change(s) to BMP and measurable goals.)

- | | | | |
|--|--------------------------|---|--------------------------|
| 1. Public Education and Outreach | <input type="checkbox"/> | 4. Construction Site Runoff Control | <input type="checkbox"/> |
| 2. Public Participation/Involvement | <input type="checkbox"/> | 5. Post-Construction Runoff Control | <input type="checkbox"/> |
| 3. Illicit Discharge Detection & Elimination | <input type="checkbox"/> | 6. Pollution Prevention/Good Housekeeping | <input type="checkbox"/> |

B. Attach the status of compliance with permit conditions, an assessment of the appropriateness of your identified best management practices and progress towards achieving the statutory goal of reducing the discharge of pollutants to the MEP, and your identified measurable goals for each of the minimum control measures.

C. Attach results of information collected and analyzed, including monitoring data, if any during the reporting period.

D. Attach a summary of the storm water activities you plan to undertake during the next reporting cycle (including an implementation schedule.)

E. Attach notice that you are relying on another government entity to satisfy some of your permit obligations (if applicable).

F. Attach a list of construction projects that your entity has paid for during the reporting period.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))

Owner Signature:

Darlene Kloeppel

Printed Name:

05/28/2021

Date:

Champaign County Executive

Title:

EMAIL COMPLETED FORM TO: epa.ms4annualinsp@illinois.gov

or Mail to: ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
WATER POLLUTION CONTROL
COMPLIANCE ASSURANCE SECTION #19
1021 NORTH GRAND AVENUE EAST
POST OFFICE BOX 19276
SPRINGFIELD, ILLINOIS 62794-9276

IL 532 2585

WPC 691 Rev 6/10

This Agency is authorized to require this information under Section 4 and Title X of the Environmental Protection Act (415 ILCS 5/4, 5/39). Failure to disclose this information may result in: a civil penalty of not to exceed \$50,000 for the violation and an additional civil penalty of not to exceed \$10,000 for each day during which the violation continues (415 ILCS 5/42) and may also prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

ANNUAL FACILITY INSPECTION REPORT

April 1, 2021

N.P.D.E.S. PHASE II PERMIT FOR STORMWATER DISCHARGES

from

MUNICIPAL SEPARATE STORM SEWER SYSTEMS

Champaign County, Illinois
NPDES Permit No. ILR40 00256

REPORTING PERIOD:

Year 2 is April 1, 2020 through March 31, 2021

MS4 OPERATOR INFORMATION:

County of Champaign, Illinois
Brookens Administrative Center
1776 East Washington Street
Urbana, IL 61802
Contact person: John Hall, Director of Planning and Zoning

GOVERNMENTAL ENTITY IN WHICH MS4 IS LOCATED:

Champaign County, Illinois

INTRODUCTION

Champaign County was identified as a small Municipal Separate Storm Sewer System (MS4) in March 2003 as part of the expanded Phase II of the National Pollutant Discharge Elimination System (NPDES) Storm Water Program.

Mandated by Congress under the Clean Water Act, the NPDES Storm Water Program is a comprehensive two-phased national program for addressing the non-agricultural sources of storm water discharges which adversely affect the quality of our nation's waters. The Clean Water Act prohibits anybody from discharging pollutants through a point source into a water of the United States unless they have an NPDES permit. A point source is any discernible, confined and discrete conveyance, such as a pipe, ditch, channel, or container.

Phase II required small MS4s in urbanized areas to obtain NPDES permits and implement six minimum control measures by using selected best management practices (BMPs).

Urbanized areas are delineated by the Census Bureau and are defined as a central place or places and the adjacent densely settled surrounding area, that together have a residential population of at least 50,000 people and an overall population density of at least 500 people per square mile. Only about 10 square miles (about 1%) of the approximately 1,000 square miles that make up Champaign County are included in the urbanized area (see the attached map).

Champaign County is not a municipality but the regulatory definition of MS4 also includes any County owned roads with a drainage system. County Highway roadside ditches are currently the only point source discharges in the urbanized area maintained by Champaign County.

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Champaign County must maintain compliance with the MS4 requirements of the NPDES Storm Water Program. MS4 compliance requires that an updated Notice of Intent (NOI) be on file at all times with the Illinois Environmental Protection Agency (IEPA). The NOI must explain which best management practices Champaign County will use to implement the six required minimum control measures. The six required minimum control measures are the following:

- **Public Education and Outreach.** Selected BMPs should educate the public on the various ways to reduce storm water pollution.
- **Public Participation and Involvement.** Selected BMPs should involve the public in developing, implementing, and reviewing MS4 best management practices.
- **Illicit Discharge Detection and Elimination.** Selected BMPs should identify improper discharges and spills to drainage systems and include enforcement mechanisms.
- **Construction Site Runoff Control.** Selected BMPs should enable construction site operators (builders and MS4s) to manage storm water runoff to reduce pollution.
- **Post-Construction Runoff Control.** Selected BMPs should enable property owners (developers and MS4s) to manage storm water runoff to reduce pollution from a site after construction activities have ended.
- **Pollution Prevention and Good Housekeeping.** Selected BMPs should enable the MS4 entity to minimize pollution from its own property and facilities by reducing pollution from streets, parking lots, open spaces and storage and vehicle maintenance areas and is discharged into local waterways or that results poor maintenance of storm sewer systems.

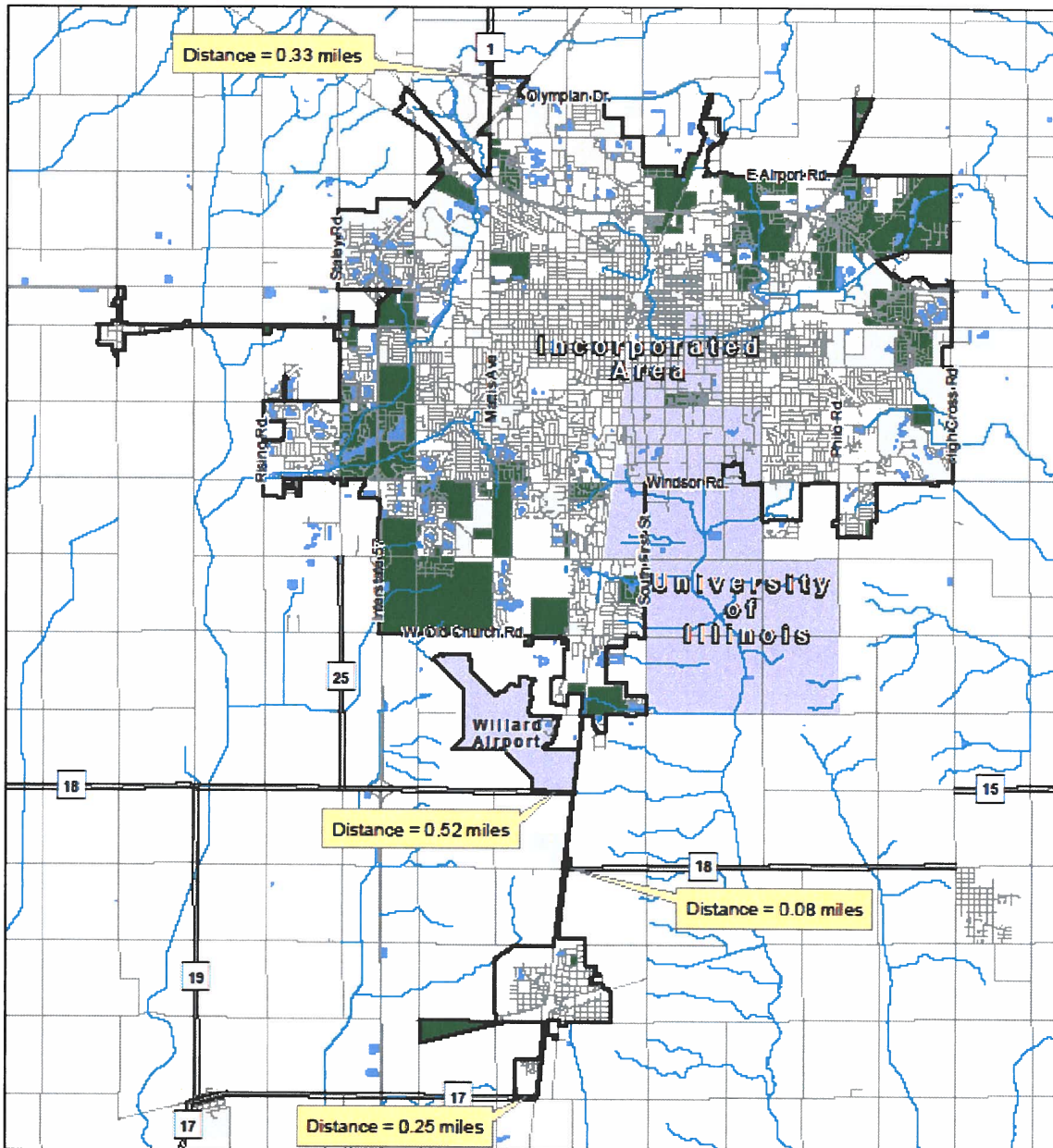
Champaign County has worked in cooperation with the other MS4s in the Champaign County Urbanized Area to share costs and expertise and common efforts to develop a regional consistency towards fulfilling the NPDES Phase II MS4 requirements.

Champaign County has sought to develop a plan suited to the MS4 requirements but also tailored to the abilities of an Illinois county. The NPDES Phase II MS4 requirements were included as a formal County land use policy in the Champaign County Land Resource Management Plan that was adopted in April 2010.

Champaign County filed a fourth NOI with IEPA to include the five-year period of April 1, 2019 to March 31, 2024. This document serves as the annual report for Year 1 activities.

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Champaign County MS4 Jurisdiction

Urbanized Area based on the 2010 Census

This map shows the defined MS4 jurisdiction including 10.4 square miles of unincorporated County. Location and size of County stormwater facilities are noted (Ex: Distance = 0.25 miles).

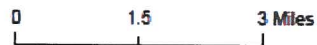
Corporate Limits updated 5/5/17

MS4 Related Boundaries

-  Urbanized Area 2010
-  Streets
-  County MS4 Area 2012



Map Created
7/17/14



B.M.P. MONITORING AND ASSESSMENT PROGRAM

Effective 3/1/16, each Small MS4 is required to implement a monitoring and assessment program to evaluate the effectiveness of selected best management practices (BMPs) at reducing pollutant loadings and water quality impacts. The monitoring and assessment program may include evaluation of BMPs and/or direct water quality monitoring, at the discretion of each Small MS4, but the program should be tailored to the size and characteristics of the Small MS4 and the relevant watershed.

Outfall/ Discharge Monitoring and Physical Stream Assessment

The Champaign County Unincorporated MS4 will collaborate with the municipal MS4 jurisdictions in Champaign County in developing a monitoring and assessment program for the Champaign County Unincorporated MS4 that matches as closely as possible the municipal MS4 monitoring and assessment programs. Municipal MS4 agencies in the Champaign-Urbana Urbanized Area rely on a combination of outfall/discharge monitoring and assessment of physical/habitat characteristics such as stream bank erosion caused by storm water discharges.

Methods and practices used for the Champaign County Unincorporated MS4 Monitoring and Assessment program will be based on municipal MS4 practices and methods as much as possible and will be supplemented as necessary by practices described in the following documents:

- *Illicit Discharge Detection and Elimination A Guidance Manual for Program Development and Technical Assessments*, published by the Center for Watershed Protection and Robert Pitt, University of Alabama, October 2004.
- *UNIFIED STREAM ASSESSMENT: A USER'S MANUAL Version 2.0, Urban Subwatershed Restoration Manual No. 10*, published by the Center for Watershed Protection, February 2005.
- *Stream Visual Assessment Protocol*, published by the United States Department of Agriculture Natural Resources Conservation Service National Water and Climate Center, Technical Note 99-1, December 1998.

Justification

The unincorporated Champaign County MS4 Area is highly interconnected with the municipal MS4 Area and using the same (or nearly the same) monitoring and assessment (M&A) methods to evaluate the effectiveness of storm water best management practices (BMPs) in the unincorporated MS4 Area may help minimize the overall costs of implementing and conducting the M&A program in the unincorporated MS4 Area; and should eliminate confusion that could otherwise result if a different approach were used than is used in the municipal MS4s; and may provide a more accurate overall understanding of the effectiveness of BMPS for the entire Champaign County urbanized area.

The *Unified Stream Assessment* (USA) is a continuous stream walk method that systematically evaluates stream conditions and that can be applied to both rural and urban streams. Staff can perform the USA with relatively minimal training. USA protocols should be adapted to meet agency needs and skills and to address regional stream conditions.

The USA includes specific protocols and model forms for documenting the assessments of Storm Water Outfalls and Severe Bank Erosion. The USA assessment for Storm Water Outfalls is very similar to the Outfall Reconnaissance Inventory (ORI) used in *Illicit Discharge Detection and Elimination*. Including ORI methods in the USA Storm Water Outfall assessments can improve the overall assessment of storm water outfalls and discharges.

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Severe bank erosion caused by storm water discharges can be accurately identified only after identifying the average erosion condition for that particular stream reach. The USA includes a Reach Level Assessment to characterize overall conditions within each reach of the stream. Guidance is included in the USA assessment of Severe Bank Erosion to help identify locations with more severe erosion. The *Stream Visual Assessment Protocol* (SVAP) also provides useful additional guidance for making the assessment of Severe Bank Erosion.

The USA protocols assume identification of uniform stream reaches. Stream reaches will be identified and mapped prior to actual field investigations. During the field investigation the various stream reaches will be identified using GIS locators. Standard worksheets will be completed for each reach for the entire length of stream in the MS4 Area. Streams (miles) to be assessed are as follows:

- Vermilion Watershed:
 - Saline Branch Drainage Ditch (3.2 miles)
- Upper Kaskaskia Watershed:
 - Copper Slough (1.6 miles)
 - Phinney Branch (1.1 miles)
- Upper Embarras Watershed
 - an unnamed tributary near Lake Park (.6 mile).

Gaining access to streams in the unincorporated MS4 Area will be a significant challenge because all the streams are on private property.

Annual monitoring is planned to occur during August through October. Annual monitoring will note the conditions for the current year and identify changes from previous years. The results will be reported in the Annual Update.

Follow up investigations may be necessary based on observed changes.

Outfalls were identified per the IEPA 4/22/16 Acceptance of Response to Noncompliance Advisory Letter.

SELF-ASSESSMENT OF PERMIT COMPLIANCE

Tables 1 through 6 summarize Champaign County Unincorporated MS4 Storm Water Program activities from April 1, 2020 through March 31, 2021. Table 7 identifies BMPs that were started and still in progress and Table 8 identifies BMPs still pending.

Table 1: Public Education and Outreach Activities 4/1/20 – 3/31/21

BMP ID	Activities
A.1.1. - Flyers and information sheets at permit counter.	Handouts are displayed and available at Planning and Zoning permit counter.
A.2.1. - Inform business groups about MS4, NPDES, and BMPs.	No requests for presentations about MS4, NPDES and BMPs were made from business groups.
A.2.2. - Inform developer, contractor, engineering, and architecture groups about MS4, NPDES, and BMPs.	No requests for presentations about MS4, NPDES and BMPs were made from business groups.
A.2.3. - Inform environmental groups about MS4, NPDES, and BMPs.	No requests for presentations about MS4, NPDES and BMPs were made from environmental groups.
A.6.1. - Educational and informational material on web page.	The MS4 Annual Facility Inspection Report was posted to the County website and to the collaborative MS4 website the Champaign County Stormwater Partnership (www.ccstormwater.org).

Table 2: Public Participation and Involvement Activities 4/1/20 – 3/31/21

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BMP ID	Activities
B.4.1. - Comply with applicable state and local public notice requirements.	All public hearings and meetings are noticed as required by state law and local ordinances and policies.
B.6.1. - Intergovernmental Storm Water Management group meetings (coordination meeting for all Champaign County MS4 jurisdictions).	During the program year County staff attended and participated in meetings with other MS4 jurisdictions on 6/9/20; 9/8/20; and 3/9/21. Champaign County staff missed the meeting held on 12/8/20.
B.6.2. - Prepare a storm water survey that can be used annually to capture public comment on the MS4 Storm Water Program.	The MS4 Storm Water Survey is on the County website at https://docs.google.com/forms/d/e/1FAIpQLSd5hbzMASGpKgPWU3kr8gmQJ-w0ZorXoCFWUUddjbMyI8P3Mg/viewform?c=0&w=1
B.6.3. - Hold Annual Public Storm Water Meeting at the Champaign County Board's Environment and Land Use Committee (ELUC) Meeting to receive public comments regarding the Champaign County Unincorporated MS4 Area Storm Water Program.	There was no Annual Public Storm Water Meeting at the Champaign County Board's Environment and Land Use Committee (ELUC) in 2020 due to the inconvenience of holding meeting remotely due to the COVID pandemic.
B.6.4. - Identify Environmental Justice areas within the Unincorporated Champaign County MS4 Area and provide appropriate public participation.	In April 2020 a random sample survey of the EJ population was conducted using the Champaign County Unincorporated MS4 Area Storm Water Survey with a postage-paid reply envelope. The results of that survey will be reviewed at the May 6, 2021 meeting of the Champaign County Board's Environment and Land Use Committee (ELUC) and will be reported in the Annual Facility Inspection Report for Year 2.
B.7.1. – Fund aspects of NPDES MS4 implementation in the County's Land Resource Management Plan implementation budget including public involvement when appropriate.	Funding for MS4 projects were included in the Work Plan for 2021.

Table 3: Illicit Discharge Detection and Elimination Activities 4/1/20 – 3/31/21

BMP ID	Activities
C.1.1. - Map drainage system outfalls into streams and rivers.	The up to date storm sewer system map for the unincorporated Champaign County MS4 Area is mapped to 100% completion including the storm sewer system map for County Highways outside the MS4 Area.
C.3.1. - Establish and maintain citizen complaint phone line for illegal dumping and illicit discharges into drainage systems.	The Department of Planning and Zoning phone line is maintained for citizen complaints regarding illegal dumping and illicit discharges.
C.3.2. - Establish citizen complaint phone line for non-complying and/or non-functioning private sewage treatment systems.	The Department of Planning and Zoning phone line is maintained for citizen complaints regarding non-complying and/or non-functioning private sewage treatment systems.
C.6.1. - Annual Report to the Environment and Land Use Committee (ELUC) of the Champaign County Board.	The MS4 Annual Report was prepared and presented to the Environment and Land Use Committee (ELUC) on May 7, 2020. and approved by the Champaign County Board on May 21, 2020.

Table 4: Construction Site Runoff Control Activities 4/1/20 – 3/31/21

BMP ID	Activities
D.1.1. - Soil erosion and sediment control regulations.	Soil erosion and sediment control regulations in the Champaign County Storm Water Management and Erosion Control Ordinance were enforced for all Land Disturbance Erosion Control (LDEC) Permits.
D.2.1. - Erosion and sediment control BMPs.	All Land Disturbance Erosion Control (LDEC) Permits were reviewed for use of appropriate BMPs.

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D.4.1. - Develop processes and procedures to evaluate proposed construction site runoff mechanisms.	Procedures to evaluate proposed construction site runoff mechanisms are refined in the review of LDEC Permits.
D.4.2. - Training class or workshop for evaluating and inspecting construction site runoff control mechanisms.	No training occurred in Year 2.
D.6.1. - Develop procedures and processes to inspect construction sites for compliance with construction site runoff mechanisms.	Procedures were refined as more experience was gained in the review of LDEC Permits.

Table 5: Post-Construction Runoff Control Activities 4/1/20 – 3/31/21

BMP ID	Activities
E.3.3. - Provide annual training in green infrastructure and/or low impact design techniques for all MS4 employees who manage or are directly involved in (or who retain others who manage or are directly involved in) the routine maintenance, repair, or replacement of public exterior surfaces. Require that contractors who are retained to manage or carry out the kinds of maintenance and relevant contractor employees also have annual training.	No training occurred in Year 2.
E.4.1. - Training class or workshop for evaluating and inspecting construction site runoff control mechanisms (post-construction).	No training occurred in Year 2.

Table 6: Pollution Prevention / Good Housekeeping Activities 4/1/20 – 3/31/21

BMP ID	Activities
F.1.2. - Spill Response Protocol.	The Champaign County Emergency Management Agency (CCEMA) conducted or participated in the following training in the program year: October 20, 2020: University of Illinois Spill Drill functional exercise; January 28, 2021: Coordinated Response Training (CoRE) with Paradigm Liaison Service (pipeline); Coordinated the quarterly Local Emergency Planning Committee (LPEC) meetings; Monthly meetings of the International Association of Fire Chiefs Community Safety-Emergency Planning, Response, and Outreach (CS-EPRO) Technical Advisory Group Meeting Community Safety Grant to promote LPEC and hazmat training.
F.1.3. - Hazardous material and storage management training.	All relevant hazardous materials storage and handling reviewed with Facilities Director.

Table 7: BMPs in Progress

BMP ID	Status
C.2.1. - Prohibit illegal dumping and illicit discharges into drainage system through Nuisance Ordinance.	Preliminary Ordinance language has been drafted regarding illegal dumping and illicit discharges into drainage systems but was not adopted in the program year.
C.3.3. - Create a database of existing private sewage treatment systems and develop management plan to bring non-compliant systems into compliance.	Records of private sewage treatment systems obtained from Public Health Department, GIS database is under development.

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D.3.1. - Prohibit illegal dumping and illicit discharges into storm drainage system from construction activities.	The Storm Water Management and Erosion Control Ordinance includes a prohibition of illegal dumping and illicit discharges from construction activities. Preliminary Nuisance Ordinance language has been drafted regarding illegal dumping and illicit discharges into drainage systems but has not yet been adopted.
E.3.1. - Develop procedures to ensure that storm water management facilities are maintained to function as designed (post-construction).	The Storm Water Management and Erosion Control Ordinance requires ongoing maintenance of storm water management facilities.
E.5.1. - Develop procedures and processes to inspect construction sites for compliance with post-construction runoff control mechanisms.	The Storm Water Management and Erosion Control Ordinance requires “as-built” documentation.

Table 8: BMPs Pending

BMP ID	Explanation of Pending Status
E.1.1. - Implement a public education program about the benefits of green infrastructure and green housekeeping in minimizing the volume of storm water runoff and pollutants from privately-owned developed property.	The BMP was not completed in the program year.
E.1.2. - Implement a public education program about the water quality impacts of overuse of fertilizers and pesticides in non-agricultural uses.	The BMP was not completed in the program year.
E.2.1. - Require annual inspections of publicly owned storm water management facilities (post-construction).	Expected to be included in the SWPPP that was supposed to be completed in 2021 but has not yet been completed.
F.1.1. - Spill prevention protocol.	Undetermined due to lack of coordination within County Departments. Expected to be established with the development of the SWPPP.
F.2.1. - Prepare a Storm Water Pollution Prevention Plan (SWPPP) for County owned facilities.	Expected to be included in the SWPPP that was supposed to be completed in 2021 but has not yet been completed.

CHANGES TO BEST MANAGEMENT PRACTICES

Attachment A summarizes that there were no proposed changes to the BMPs during the reporting year.

STATUS OF COMPLIANCE

Attachment B reviews the status of compliance for all BMPs.

INFORMATION COLLECTED AND ANALYZED IN YEAR 2

Attachment C summarizes that there were no observations or reports made or received during the reporting year.

STORMWATER PROGRAM ACTIVITIES PROPOSED FOR NEXT PROGRAM YEAR APRIL 1, 2021 – MARCH 31, 2022

The activities proposed for next Program Year April 1, 2021 – March 31, 2022 are summarized in Attachment D.

RELIANCE ON OTHER GOVERNMENTAL ENTITY

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Champaign County does and will continue to participate in and share resources with the Cooperative MS4 Group; however, it does not rely on another governmental entity to satisfy its permit obligations.

YEAR 2 CONSTRUCTION PROJECTS

Champaign County construction projects may be authorized under the Facilities Department or the Highway Department.

Projects and details of Highway Construction Projects are provided in Table 9.

ATTACHMENTS

- A Changes to Best Management Practices
- B Status of Compliance with N.P.D.E.S. Permit Conditions for Year 2
- C Information Collected for Year 2
- D Proposed NPDES Permit Activities for next Program Year April 1, 2021 - March 31, 2022
- E Champaign County Unincorporated MS4 Area Storm Water Survey Results March 31, 2021
- F Champaign County Unincorporated MS4 Area Environmental Justice Areas January 1, 2020

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APRIL 1, 2021

Table 9: Highway Construction Projects¹ from April 1, 2020 through March 31, 2021

Section Number	Road District	Project Type	Area of Disturbance	Status
15-00028-00-BR	Champaign County C.H. 16	Bridge Replacement	<1 acre	Expected completion in 2018 (Completed)
15-21440-00-SP	Raymond Twp.	Railroad Crossing	<1 acre	Completed
16-00443-00-RS	Champaign County	C.I.R. Foamed Asphalt	<1 acre	Expected completion in 2018 (Completed)
16-00444-00-SP	Champaign County	Guardrail Replacement	>1 acre	Expected completion in 2019 (Completed)
17-00445-00-RS	Champaign County C.H. 13	H.I.R.	<1 acre	Expected completion in 2018 (Completed)
17-00446-00SW	Champaign County	Sidewalk install	<1 acre	2018 (Completed)
17-00041-00-BR, 17-00042-00-BR	Champaign County	Bridge Replacement	<1 acre	Expected completion in 2018 (Completed)
17-16043-00-BR	Newcomb Twp.	Bridge Replacement	<1 acre	Expected completion in 2018 (Completed)
18-00447-00-SP	Champaign County	Stop Sign Installation	>1 acre	Expected completion in 2018 (Completed)
18-00448-00-RS	Champaign County Staley Road	H.I.R.	<1 acre	Expected completion in 2018 (Completed)
18-03000-00-RS	Champaign Twp.	H.I.R.	<1 acre	Expected completion in 2018 (Completed)
18-00449-00-RS	Champaign County C.H. 19	Culvert Replacement	<1 acre	Expected completion in 2019 (Completed)
18-30001-00-SS	Urbana Twp.	Storm Sewer	<1 acre	Expected completion in 2018 (Completed)
18-30002-00-RS	Urbana Twp.	Resurfacing Pavement	None	Expected completion in 2018 (Completed)
18-27001-00-RS	St. Joseph Twp.	Resurfacing Pavement	None	Expected completion in 2018 (Completed)
18-30449-00-RS	Champaign County C.H. 9	Resurfacing Pavement	>1 acre	Expected completion in 2019 (Completed)
18-00060-00-BR	Champaign County C.H. 18	Bridge Replacement	<1 acre	Expected completion in 2019 (Completed)
18-00061-00-BR	Champaign County C.H. 17	Bridge Replacement	<1 acre	Expected completion in 2019 (Completed)
18-00062-00-BR	Champaign County C.H. 15	Bridge Replacement	<1 acre	Expected completion in 2019 (Completed)
18-00065-00-BR	Champaign County C.H. 9	Bridge Replacement	<1 acre	Expected completion in 2019 (Completed)
14-00438-00-RS	Champaign County C.H. 23	Resurfacing Pavement	>1 acre	Expected completion in 2018 (Completed)
19-23000-00-RS	St. Joseph Twp.	Resurfacing Pavement	None	Expected completion in 2019 (Completed)
18-15063-00-BR	Mahomet Twp.	Bridge Replacement	<1 acre	Expected completion in 2020
18-00451-00-SP	Champaign County C.H. 15	Resurfacing Pavement	<1 acre	Expected completion in 2021

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Table 9: Highway Construction Projects¹ from April 1, 2020 through March 31, 2021

Section Number	Road District	Project Type	Area of Disturbance	Status
18-02064-00-BR	Brown Township	Culvert Replacement	<1 acre	Expected completion in 2018 (Completed)
19-07066-00-BR	Condit Township	Culvert Replacement	<1 acre	Expected completion in 2019 (Completed)
19-01067-00-BR, 19-01068-00-BR, 19-01069-00-BR, 19-01070-00-BR	Ayers Township	Bridge Repair	<1 acre	Expected completion in 2019 (Completed)
19-25071-00-BR	Somer Township	Culvert Replacement	<1 acre	Expected completion in 2019 (Completed)
19-20072-00-BR	Rantoul Township	Culvert Replacement	<1 acre	Expected completion in 2019 (Completed)
19-21073-00-BR	Raymond Township	Culvert Replacement	<1 acre	Expected completion in 2019 (Completed)
19-00074-00-BR, 19-00075-00-BR	Champaign County	Bridge Repair	<1 acre	Expected completion in 2019 (Completed)
19-06076-00-BR	Compromise Township	Culvert Replacement	<1 acre	Expected completion in 2019 (Completed)
19-00077-00-BR	Champaign County C.H. 13	Bridge Replacement	<1 acre	Expected completion in 2019 (Completed)
19-13078-00-BR	Kerr Township	Culvert Replacement	<1 acre	Expected completion in 2019 (Completed)
19-27079-00-BR	St. Joseph Township	Bridge Repair	<1 acre	Expected completion in 2019 (Completed)
19-00080-00-BR	Champaign County C.H. 11	Bridge Replacement	<1 acre	Expected completion in 2019 (Completed)
19-29081-00-BR	Tolono Township	Bridge Replacement	<1 acre	Expected completion in 2019 (Completed)
19-11082-00-BR, 19-11083-00-BR	Harwood Township	Culvert Replacement	<1 acre	Expected completion in 2019 (Completed)
20-01084-00-BR	Ayers Township	Culvert Replacement	<1 acre	Expected completion in 2019 (Completed)
20-25085-00-BR	Somer Township	Culvert Replacement	<1 acre	Expected completion in 2020 (3 locations; Completed)
20-00086-00-BR	Champaign County C.H. 32	Bridge Replacement	<1 acre	Expected completion in 2022 (Completed)
20-000-87-00-BR	Champaign County	Bridge Repair	<1 acre	Expected completion in 2020 (Completed)
20-22088-00-BR, 20-22089-00-BR	Sadorus Township	Bridge Repair	<1 acre	Expected completion in 2020 (Completed)
20-28090-00-BR	Stanton Township	Culvert Replacement	<1 acre	Expected completion in 2020 (Completed)
20-05091-00-BR, 20-05092-00-BR	Colfax Township	Bridge Repair	<1 acre	Expected completion in 2020 (Completed)
20-06093-00-BR	Compromise Township	Culvert Replacement	<1 acre	Expected completion in 2020 (Completed)

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Table 9: Highway Construction Projects¹ from April 1, 2020 through March 31, 2021

Section Number	Road District	Project Type	Area of Disturbance	Status
20-08094-00-BR	Crittenden Township	Culvert Replacement	<1 acre	Expected completion in 2020 (Completed)
20-06095-00-BR	Compromise Township	Bridge Replacement	<1 acre	Expected completion in 2021 (Completed)
20-25096-00-BR	Somer Twp.	Culvert Replacement	<1 acre	Expected completion in 2020 (Completed)
20-10097-00-BR	East Bend Twp.	Culvert Replacement	<1 acre	Expected completion in 2021
20-16098-00-BR	Newcomb Twp.	Culvert Replacement	<1 acre	Expected completion in 2021
20-17099-00-BR	Ogden Twp.	Culvert Replacement	<1 acre	Expected completion in 2021 (Completed)
20-24100-00-BR	Sidney Twp.	Culvert Replacement	<1 acre	Expected completion in 2020 (Completed)
20-21101-00-BR	Raymond Twp.	Culvert Replacement	<1 acre	Expected completion in 2020 (Completed)
20-00102-00-BR	Champaign County	Bridge Rehab	<1 acre	Expected completion in 2021
20-19103-00-BR	Philo Twp.	Culvert Replacement	<1 acre	Expected completion in 2021
20-12104-00-BR	Hensley Twp.	Culvert Replacement	<1 acre	Expected completion in 2021
20-08105-00-BR	Crittenden Twp.	Culvert Replacement	<1 acre	Expected completion in 2021
21-22106-00-BR	Sadorus Twp.	Bridge Repair	<1 acre	Expected completion in 2021
21-22107-00-BR	Sadorus Twp.	Bridge Repair	<1 acre	Expected completion in 2021
20-11108-00-BR	Harwood Twp.	Culvert Replacement	<1 acre	Expected completion in 2021
20-25109-00-BR	Somer Twp.	Culvert Replacement	<1 acre	Expected completion in 2021
20-18110-00-BR	Village of Pesotum	Bridge Replacement	<1 acre	Expected completion in 2022
19-00452-00-SP	Somer Twp.	RR Xing Rehab	<1 acre	Expected completion in 2022
20-00453-00-RS	Champaign County	Resurfacing/Widening	>24 acre	Expected completion in 2021
20-00455-00-RS	Champaign County	Resurfacing/Widening	<1 acre	Expected completion in 2022

NOTES

1. All construction projects during this period were roadway projects.

Attachment A. Changes to Best Management Practices
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There were no proposed changes to the BMPs between April 1, 2020 and March 31, 2021.

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BMP No.	Brief Description of Best Management Practice (BMP)	Status	Measurable Goal	Year 2 Milestone	Description of Activities
1	Flyers and information sheets at permit counter.	COMPLETE	Develop and distribute one new educational material handout.	Distribute handout.	Handouts are displayed and available at the service counter.
2	Inform business groups about MS4, NPDES, and BMPs.	COMPLETE	Conduct one presentation per year upon request.	Conduct one presentation upon request.	No requests for presentations about MS4, NPDES and BMPs were made from business groups.
3	Inform developer, contractor, engineering, and architecture groups about MS4, NPDES, and BMPs.	COMPLETE	Conduct one presentation per year upon request.	Conduct one presentation upon request.	No requests for presentations about MS4, NPDES and BMPs were made from developer, contractor, engineering, and architecture groups.
4	Inform environmental groups about MS4, NPDES, and BMPs.	COMPLETE	Conduct one presentation per year upon request.	Conduct one presentation upon request.	No requests for presentations about MS4, NPDES and BMPs were made from environmental groups.
6	Educational and informational material on web page.	COMPLETE	Develop web page with annual updates on informational and educational materials.	Update web page.	The MS4 Annual Facility Inspection Report was posted to the County website and to the collaborative MS4 website the Champaign County Stormwater Partnership (www.ccstormwater.org).
7	Comply with applicable state and local public notice requirements.	COMPLETE	Annual number of meetings with MS4 related topics. Maintain electronic records of notices, agendas, and public participation.	Provide notice of MS4 related meetings and provide opportunity for public input.	All public hearings and meetings are noticed as required by state law and local ordinances and policies.
8	Intergovernmental Storm Water Management group meetings (coordination meeting for all Champaign County MS4 jurisdictions).	COMPLETE	Hold at least 4 coordination meetings each year.	Attend meetings.	During the program year County staff attended and participated in meetings with other MS4 jurisdictions on 6/9/20; 9/8/20; and 3/9/21. Champaign County staff missed the meeting held on 12/8/20.

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BMP No.	Brief Description of Best Management Practice (BMP)	Status	Measurable Goal	Year 2 Milestone	Description of Activities
9	<p>B.6.2 Prepare a storm water survey that can be used annually to capture public comment on the MS4 Storm Water Program.</p>	<p>COMPLETE</p>	<p>Conduct the annual MS4 Storm Water Survey on the County website.</p>	<p>Make the MS4 Area Storm Water Survey available on the County website.</p>	<p>The MS4 Storm Water Survey is on the County website at https://docs.google.com/forms/d/e/1FAIpQLSd5hbzMASGpKgpWU3kr8gmQJ-w0ZorXoCFWUuddjbMy18P3Mg/viewform?c=0&w=1</p>
10	<p>B.6.3 Hold Annual Public Storm Water Meeting at the Champaign County Board's Environment and Land Use Committee (ELUC) to receive public comments regarding the Champaign County Unincorporated MS4 Area Storm Water Program.</p>	<p>INCOMPLETE</p>	<p>Have the Champaign County Unincorporated MS4 Area Storm Water Program as an Agenda item at one ELUC Meeting each year.</p>	<p>Have the Champaign County Unincorporated MS4 Area Storm Water Program as an Agenda item at the May ELUC meeting.</p>	<p>There was no Annual Public Storm Water Meeting at the Champaign County Board's Environment and Land Use Committee (ELUC) in 2020 due to the inconvenience of holding meeting remotely due to the COVID pandemic.</p>
11	<p>B.6.4 Identify Environmental Justice areas within the Unincorporated Champaign County MS4 Area and provide appropriate public participation.</p>	<p>COMPLETE</p>	<p>Identify Environmental Justice (EJ) areas within the Unincorporated Champaign County MS4 Area based on most current state economic data and randomly sample the EJ area population for storm water concerns via postal mail with prepaid reply envelopes. Review annual survey results at the Annual Public Storm Water Meeting at the Champaign County Board's Environment and Land Use Committee (ELUC).</p>	<p>Identify Environmental Justice (EJ) areas within the Unincorporated Champaign County MS4 Area based on most current state economic data and randomly sample the EJ area population for storm water concerns via postal mail with prepaid reply envelopes and review annual survey results at the Annual Public Storm Water Meeting the Champaign County Board's Environment and Land Use Committee (ELUC).</p>	<p>In April 2020 a random sample survey of the EJ population was conducted using the Champaign County Unincorporated MS4 Area Storm Water Survey with a postage-paid reply envelope. The results of that survey will be reviewed at the May 6, 2021 meeting of the Champaign County Board's Environment and Land Use Committee (ELUC) and reported in the Annual Facility Inspection Report for next Program Year 4/1/20- 3/31/21.</p>

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BMP No.	Brief Description of Best Management Practice (BMP)	Status	Measurable Goal	Year 2 Milestone	Description of Activities
12	B.7.1 Fund aspects of NPDES MS4 implementation in the County's Land Resource Management Plan implementation budget including public involvement when appropriate.	COMPLETE	Include NPDES MS4 requirements in the County's Land Resource Management Plan and include in annual long-range work plan as required.	Include MS4 in work plan for FY21.	Funding for MS4 projects were included in the Work Plan for 2021.
13	C.1.1 Map drainage system outfalls into streams and rivers.	COMPLETED	Complete a system wide updated every three years.	Update Champaign County Unincorporated MS4 Area storm sewer system map as new information becomes available.	The up to date storm sewer system map for the unincorporated Champaign County MS4 Area is mapped to 100% completion including the storm sewer system map for County Highways outside the MS4 Area.
14	C.2.1 Prohibit illegal dumping and illicit discharges into drainage system through Nuisance Ordinance.	IN PROGRESS	Review existing Nuisance Ordinance and revise to include illegal dumping and illicit discharges into drainage systems.	Enforce amended Nuisance Ordinance	None. Preliminary Ordinance language regarding illegal dumping and illicit discharges into drainage systems had been previously drafted but has not yet been adopted.
15	C.3.1 Establish and maintain citizen complaint phone line for illegal dumping and illicit discharge into drainage systems.	COMPLETE	Maintain phone line.	Maintain complaint phone line and record of complaints.	The Department of Planning and Zoning phone line is maintained for citizen complaints regarding illegal dumping and illicit discharges.
16	C.3.2 Establish citizen complaint phone line for non-complying and/or non-functioning private sewage treatment systems.	COMPLETE	Develop and maintain phone line.	Maintain complaint phone line and record of complaints.	The Department of Planning and Zoning phone line is maintained for citizen complaints regarding non-complying and/or non-functioning private sewage treatment systems.

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BMP No.	Brief Description of Best Management Practice (BMP)	Status	Measurable Goal	Year 2 Milestone	Description of Activities
17	C.3.3 Create a database of existing private sewage treatment systems and develop a management plan to bring non-compliant systems into compliance.	IN PROGRESS	Create database and develop, adopt, and implement management plan.	Create database and develop management plan.	Records of private sewage treatment systems obtained from Public Health Department; GIS database is under development.
18	C.6.1 Annual Report to the Environment and Land Use Committee (ELUC) of the Champaign County Board.	COMPLETE	Present Annual Report and place on file.	Complete Annual Report and place on file.	The MS4 Annual Report was prepared and presented to the Environment and Land Use Committee (ELUC) on May 7, 2020 and approved by the Champaign County Board on May 21, 2020.
19	D.1.1 Soil erosion and sediment control regulations.	COMPLETE	Review existing erosion and sediment control regulations. Prepare draft regulations for County Board adoption and enforce adopted regulations.	Enforce soil erosion and sediment control ordinance (Storm Water Management and Erosion Control Ordinance).	Soil erosion and sediment control regulations in the Champaign County Storm Water Management and Erosion Control Ordinance were enforced for all Land Disturbance Erosion Control (LDEC) Permits.
20	D.2.1 Erosion and sediment control BMPs.	COMPLETE	Review and evaluate existing BMPs to determine which should be included in the erosion and sediment control ordinance. Review existing regulations and develop new regulations for ordinance.	Review plans and development for appropriate use of BMPs as required by adopted ordinance (Storm Water Management and Erosion Control Ordinance).	All Land Disturbance Erosion Control (LDEC) Permits were reviewed for use of appropriate BMPs.
21	D.3.1 Prohibit illegal dumping and illicit discharges into storm drainage system from construction activities.	IN PROGRESS	Enforce Storm Water Management and Erosion Control (SWMEC) Ordinance prohibition on illegal dumping and illicit discharge into drainage systems from construction activities. Review existing Nuisance Ordinance and, if	Enforce SWMEC Ordinance prohibition on illegal dumping and illicit discharge into drainage systems from construction activities.	The Storm Water Management and Erosion Control Ordinance includes a prohibition of illegal dumping and illicit discharges from construction activities. Preliminary Nuisance Ordinance language has been drafted regarding illegal dumping and illicit discharges into drainage

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BMP No.	Brief Description of Best Management Practice (BMP)	Status	Measurable Goal	Year 2 Milestone	Description of Activities
			needed, revise to prohibit illegal dumping and illicit discharge into drainage systems from construction activities, same as SWMEC Ordinance.		systems but has not yet been adopted.
22	D.4.1 Develop processes and procedures to evaluate proposed construction site runoff mechanisms.	COMPLETE	Develop procedures and processes to evaluate proposed construction site runoff mechanisms.	Develop, implement and refine review procedures to evaluate proposed construction site runoff mechanisms.	Procedures to evaluate proposed construction site runoff mechanisms are refined in the review of LDEC Permits.
23	D.4.2 Training class or workshop for evaluating and inspecting construction site runoff control mechanisms.	INCOMPLETE	Zoning Officer (or Director's designee) attendance at training class or workshop for evaluating and inspecting construction site runoff control mechanisms.	Director's designee attends training.	No training occurred in Year 2.
24	D.6.1 Develop procedures and processes to inspect construction sites for compliance with construction site runoff mechanisms.	COMPLETE	Develop procedures and processes to inspect construction sites for compliance with construction site runoff mechanisms.	Develop and implement procedures and processes to inspect construction sites for compliance with construction site runoff mechanisms.	Procedures were refined as more experience was gained in the review of LDEC.
25	E.1.1 Implement a public education program about the benefits of green infrastructure and green housekeeping in minimizing the volume of storm water runoff and pollutants from privately owned developed property.	INCOMPLETE	Add a Green Infrastructure page to the Champaign County website to educate landowners about the benefits of green infrastructure and green housekeeping in minimizing the volume of storm water runoff and pollutants from privately owned developed property.	Maintain the Champaign County Green Infrastructure & Green Housekeeping web page.	NONE

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BMP No.	Brief Description of Best Management Practice (BMP)	Status	Measurable Goal	Year 2 Milestone	Description of Activities
26	E.1.2 Implement a public education program about the water quality impacts of overuse of fertilizers and pesticides in non-agricultural uses.	<i>INCOMPLETE</i>	Add a Sustainable Lawn Care page to the Champaign County website to educate landowners about the water quality impacts of overuse of fertilizers and pesticides in non-agricultural uses.	Maintain the Champaign County Sustainable Lawn Care web page.	NONE
27	E.2.1 Require annual inspections of publicly owned storm water management facilities (post-construction).	<i>INCOMPLETE</i>	Procedures for maintenance of publicly owned storm water management facilities (post-construction) should be established in the Champaign County SWPPP.	Conduct annual inspection and maintenance if required of publicly owned storm water management facilities (post-construction).	NONE
28	E.3.1 Develop procedures to ensure that storm water management facilities are maintained to function as designed (post-construction).	<i>IN PROGRESS</i>	Develop and implement procedures to ensure that storm water facilities are maintained to function as designed (post-construction).	Implement procedures to ensure that storm water facilities are maintained to function as designed (post-construction).	The Storm Water Management and Erosion Control Ordinance requires ongoing maintenance of storm water management facilities.
29	E.3.3 Provide annual training in green infrastructure and/or low impact design techniques for all MS4 employees who manage or are directly involved in (or who retain others who manage or are directly involved in) the routine maintenance, repair, or replacement of public exterior surfaces. Require that contractors who are retained to manage or carry out the kinds of maintenance and relevant contractor employees also have annual training	<i>INCOMPLETE</i>	Provide annual training in green infrastructure and/or low impact design techniques for all MS4 employees who manage or are directly involved in (or who retain others who manage or are directly involved in) the routine maintenance, repair, or replacement of public exterior surfaces. Require that contractors who are retained to manage or carry out the kinds of maintenance and relevant contractor	Provide annual training in green infrastructure and/or low impact design techniques for all relevant managers, employees, and/or contractors and contractor employees.	No training occurred in Year 2.

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BMP No.	Brief Description of Best Management Practice (BMP)	Status	Measurable Goal	Year 2 Milestone	Description of Activities
30	E.4.1 Training class or workshop for evaluating and inspecting construction site runoff control mechanisms (post-construction).	<i>INCOMPLETE</i>	employees also have annual training. Director's designee attendance at training class or workshop for evaluating and inspecting construction site runoff control mechanisms (post-construction).	Director's designee attends training.	No training occurred in Year 2.
31	E.5.1 Develop procedures and processes to inspect construction sites for compliance with post-construction runoff control mechanisms.	<i>IN PROGRESS</i>	Develop procedures and processes to inspect construction sites for compliance with approved post-construction site runoff control mechanisms.	Implement procedures to inspect construction sites for compliance with approved post-construction runoff control mechanisms.	The Storm Water Management and Erosion Control Ordinance requires "as-built" documentation.
32	F.1.1 Spill prevention protocol.	<i>INCOMPLETE</i>	Conduct annual spill prevention training with appropriate County staff. Track meeting agenda, materials, and attendee sign-in sheet.	Complete annual spill prevention training with appropriate County staff.	NONE
33	F.1.2 Spill response protocol.	<i>COMPLETE</i>	Conduct annual spill response training with appropriate County staff. Track meeting agenda, materials, and attendee sign-in sheet.	Complete annual spill response training with appropriate County staff.	The Champaign County Emergency Management Agency (CCEMA) conducted or participated in the following training in the program year: October 20, 2020: University of Illinois Spill Drill functional exercise; January 28, 2021: Coordinated Response Training (CoRE) with Paradigm Liaison Service (pipeline);

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BMP No.	Brief Description of Best Management Practice (BMP)	Status	Measurable Goal	Year 2 Milestone	Description of Activities
34	F.1.3 Hazardous material and storage management training.	COMPLETE	Conduct annual hazardous material and storage management training with appropriate staff. Track meeting agenda, materials, and attendee sign-in sheet.	Complete annual hazardous material and storage management training with appropriate County staff.	Coordinated the quarterly Local Emergency Planning Committee (LPEC) meetings; Monthly meetings of the International Association of Fire Chiefs Community Safety-Emergency Planning, Response, and Outreach (CS-EPRO) Technical Advisory Group Meeting Community Safety Grant to promote LPEC and hazmat training.
35	F.2.1 Prepare a Storm Water Pollution Prevention Plan (SWPPP) for County owned facilities.	INCOMPLETE	Prepare SWPPP for all County owned facilities.	Complete the Draft SWPPP for all County owned facilities.	None.

There was no information collected between April 1, 2020 and March 31, 2021.

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BMP No.	Brief Description of Best Management Practice (BMP)	Measurable Goal	Year 1 Milestone (4/1/19-3/31/20)	Proposed Activity Next Program Year 4/1/20-3/31/21
A.1.1	Flyers and information sheets at permit counter.	Develop and distribute one new educational material handout.	Distribute handout.	Distribute handout.
A.2.1	Inform business groups about MS4, NPDES, and BMPs.	Conduct one presentation per year upon request.	Conduct one presentation upon request.	Conduct one presentation upon request.
A.2.2	Inform developer, contractor, engineering, and architecture groups about MS4, NPDES, and BMPs.	Conduct one presentation per year upon request.	Conduct one presentation upon request.	Conduct one presentation upon request.
A.2.3	Inform environmental groups about MS4, NPDES, and BMPs.	Conduct one presentation per year upon request.	Conduct one presentation upon request.	Conduct one presentation upon request.
A.6.1	Educational and informational material on web page.	Develop web page with annual updates on informational and educational materials.	Update web page.	Update web page.
B.4.1	Comply with applicable State and local public notice requirements.	Annual number of meetings with MS4 related topics. Maintain electronic records of notices, agendas, and public participation.	Provide notice of MS4 related meetings and provide opportunity for public input.	Provide notice of MS4 related meetings and provide opportunity for public input.
B.6.1	Intergovernmental Storm Water Management group meetings (coordination meetings for all Champaign County MS4 jurisdictions)	Hold at least 4 coordination meetings each year.	Attend meetings.	Attend meetings.
B.6.2	Prepare a storm water survey that can be used annually to capture public comment on the MS4 Storm Water Program.	Conduct the annual MS4 Storm Water Survey on the County website.	Make the MS4 Storm Water Survey available on the Champaign County website.	Make the MS4 Storm Water Survey available on the Champaign County website.
B.6.3	Hold Annual Public Storm Water Meeting at the Champaign County Board's Environment and Land Use Committee (ELUC) Meeting to receive public comments regarding the Champaign County Unincorporated MS4 Area Storm Water Program.	Have the Champaign County Unincorporated MS4 Area Storm Water Program as an Agenda item at one ELUC Meeting each year.	Have the Champaign County Unincorporated MS4 Area Storm Water Program as an Agenda item at the May ELUC Meeting.	Have the Champaign County Unincorporated MS4 Area Storm Water Program as an Agenda item at the May ELUC Meeting.

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BMP No.	Brief Description of Best Management Practice (BMP)	Measurable Goal	Year 1 Milestone (4/1/19-3/31/20)	Proposed Activity Next Program Year 4/1/20-3/31/21
B.6.4	Identify Environmental Justice areas within the Unincorporated Champaign County MS4 Area and provide appropriate public participation.	Identify Environmental Justice (EJ) areas within the Unincorporated Champaign County MS4 Area based on most current state economic data and randomly sample the EJ area population for storm water concerns via postal mail with prepaid reply envelopes. Review annual survey results at the Annual Public Storm Water Meeting at the Champaign County Board's Environment and Land Use Committee (ELUC).	Identify Environmental Justice (EJ) areas within the Unincorporated Champaign County MS4 Area based on most current state economic data and randomly sample the EJ area population for storm water concerns via postal mail with prepaid reply envelopes and review annual survey results at the Annual Public Storm Water Meeting the Champaign County Board's Environment and Land Use Committee (ELUC).	Identify Environmental Justice (EJ) areas within the Unincorporated Champaign County MS4 Area based on most current state economic data and randomly sample the EJ area population for storm water concerns via postal mail with prepaid reply envelopes and review annual survey results at the Annual Public Storm Water Meeting at the Champaign County Board's Environment and Land Use Committee (ELUC).
B.7.1	Fund aspects of NPDES MS4 implementation in the County's Land Resource Management Plan	Include NPDES MS4 requirements in the County's Land Resource Management Plan and include in annual long-range work plan as required.	Include MS4 in work plan for FY20.	Include MS4 in work plan for FY22.
C.1.1.1	Map drainage system outfalls into streams and rivers.	Complete a system wide update every 3 years.	Update Champaign County Unincorporated MS4 Area storm sewer system map as new information becomes available.	System wide update of the Champaign County Unincorporated MS4 Area storm sewer system map.

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BMP No.	Brief Description of Best Management Practice (BMP)	Measurable Goal	Year 1 Milestone (4/1/19-3/31/20)	Proposed Activity Next Program Year 4/1/20-3/31/21
C.2.1	Prohibit illegal dumping and illicit discharges into drainage systems through Nuisance Ordinance.	Review existing Nuisance Ordinance and revise to include illegal dumping and illicit discharges into drainage systems.	Amend Nuisance Ordinance with new language prohibiting illegal dumping and illicit discharges into drainage system. MILESTONE NOT ACHIEVED – Draft has not been adopted yet.	Amend Nuisance Ordinance with new language prohibiting illegal dumping and illicit discharges into drainage system.
C.3.1	Establish and maintain citizen complaint phone line for illegal dumping and illicit discharges into drainage systems.	Maintain phone line.	Maintain complaint phone line and record of complaints.	Maintain complaint phone line and record of complaints.
C.3.2	Establish citizen complaint phone line for non-complying and/or non-functioning private sewage treatment systems.	Develop and maintain phone line.	Maintain complaint phone line and record of complaints.	Maintain complaint phone line and record of complaints.
C.3.3	Create a database of existing private sewage treatments systems and develop a management plan to bring non-compliant systems into compliance.	Create database and develop, adopt and implement management plan.	Create database and develop management plan. MILESTONE NOT ACHIEVED	Create database and develop management plan.
C.6.1	Annual report to the Environment and Land Use Committee (ELUC) of the Champaign County Board.	Present Annual Report and place on file.	Complete Annual Report and place on file.	Complete Annual Report and place on file.
D.1.1	Soil erosion and sediment control regulations.	Review existing erosion and sediment control regulations. Prepare draft regulations for County Board adoption and enforce adopted regulations.	Enforce Soil Erosion and Sediment Control Ordinance (Storm Water Management and Erosion Control Ordinance).	Enforce Soil Erosion and Sediment Control Ordinance (Storm Water Management and Erosion Control Ordinance).
D.2.1	Erosion and sediment control BMPs.	Review and evaluate existing BMPs to determine which should be included in the erosion and sediment control ordinance. Review existing regulations and develop new regulations for the ordinance.	Review plans and development for appropriate use of BMPs as required by adopted ordinance (Storm Water Management and Erosion Control Ordinance).	Review plans and development for appropriate use of BMPs as required by adopted ordinance (Storm Water Management and Erosion Control Ordinance).

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BMP No.	Brief Description of Best Management Practice (BMP)	Measurable Goal	Year 1 Milestone (4/1/19-3/31/20)	Proposed Activity Next Program Year 4/1/20-3/31/21
D.3.1	Prohibit illegal dumping and illicit discharges into storm drainage system from construction activities.	Enforce Storm Water Management and Erosion Control (SWMEC) Ordinance prohibition on illegal dumping and illicit discharge into drainage systems from construction activities. Review existing Nuisance Ordinance and, if needed, revise to prohibit illegal dumping and illicit discharge into drainage systems from construction activities, same as SWMEC Ordinance.	Enforce SWMEC Ordinance prohibition on illegal dumping and illicit discharges into drainage systems from construction activities. MILESTONE NOT ACHIEVED – Draft has not been adopted yet.	Enforce SWMEC Ordinance prohibition on illegal dumping and illicit discharges into drainage systems from construction activities.
D.4.1	Develop procedures and processes to evaluate proposed construction site runoff mechanisms.	Develop procedures and processes to evaluate proposed construction site runoff mechanisms.	Develop, implement and refine review procedures to evaluate proposed construction site runoff mechanisms.	Develop, implement and refine review procedures to evaluate proposed construction site runoff mechanisms.
D.4.2	Training class/workshop for evaluating and inspecting construction site runoff control mechanism.	Zoning Officer (or Director’s designee) attendance at training class or workshop for evaluating and inspecting construction site runoff control mechanisms.	Director’s designee attends training. MILESTONE NOT ACHIEVED	Director’s designee attends training.
D.6.1	Develop procedures and processes to inspect construction sites for compliance with construction site runoff mechanisms.	Develop procedures and processes to inspect construction sites for compliance with construction site runoff mechanisms.	Develop and implement procedures and processes to inspect construction sites for compliance with construction site runoff mechanisms.	Develop and implement procedures and processes to inspect construction sites for compliance with construction site runoff mechanisms.
E.1.1	Implement a public education program about the benefits of green infrastructure and green housekeeping in minimizing the volume of storm water runoff and pollutants from existing privately owned developed property.	Add a Green Infrastructure page to the Champaign County website to educate landowners about the benefits of green infrastructure and green housekeeping in minimizing the volume of storm water runoff and pollutants from existing privately-owned developed property.	Develop and implement a Champaign County Green Infrastructure & Green Housekeeping web page. MILESTONE NOT ACHIEVED	Develop and implement a Champaign County Green Infrastructure & Green Housekeeping web page.

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BMP No.	Brief Description of Best Management Practice (BMP)	Measurable Goal	Year 1 Milestone (4/1/19-3/31/20)	Proposed Activity Next Program Year 4/1/20-3/31/21
E.1.2	Implement a public education program about the water quality impacts of overuse of fertilizers and pesticides in non-agricultural uses.	Add a Sustainable Lawn Care page to the Champaign County website to educate landowners about the water quality impacts of overuse of fertilizers and pesticides in non-agricultural uses.	Develop and implement a Champaign County Sustainable Lawn Care web page. MILESTONE NOT ACHIEVED	Develop and implement a Champaign County Sustainable Lawn Care web page.
E.2.1	Require annual inspection of publicly owned storm water management facilities (post-construction).	Procedures for maintenance of publicly owned storm water management facilities (post-construction) should be established in the Champaign County SWPPP.	Develop and implement procedures for maintenance of publicly owned storm water management facilities (post-construction) in the Champaign County SWPPP. MILESTONE NOT ACHIEVED	Develop and implement procedures for maintenance of publicly owned storm water management facilities (post-construction) in the Champaign County SWPPP.
E.3.1	Develop procedures to ensure that storm water facilities are maintained to function as designed (post- construction).	Develop and implement procedures to ensure that storm water facilities are maintained to function as designed (post-construction).	Develop and implement procedures to ensure that storm water facilities are maintained to function as designed (post-construction). MILESTONE NOT ACHIEVED	Develop and implement procedures to ensure that storm water facilities are maintained to function as designed (post-construction).
E.3.3	Provide annual training in green infrastructure and/or low impact design techniques for all MS4 employees who manage or are directly involved in) the routine maintenance, repair, or replacement of public exterior surfaces. Require that contractors who are retained to manage or carry out the kinds of maintenance and relevant contractor employees also have annual training.	Provide annual training in green infrastructure and/or low impact design techniques for all MS4 employees who manage or are directly involved in) the routine maintenance, repair, or replacement of public exterior surfaces. Require that contractors who are retained to manage or carry out the kinds of maintenance and relevant contractor employees also have annual training.	Provide annual training in green infrastructure and/or low impact design techniques for all relevant managers, employees, and/or contractors and contractor employees. MILESTONE NOT ACHIEVED	Provide annual training in green infrastructure and/or low impact design techniques for all relevant managers, employees, and/or contractors and contractor employees.

Attachment D. N.P.D.E.S. Permit Activities for Next Reporting Year April 1, 2020 – March 31, 2021
CHAMPAIGN COUNTY, ILLINOIS MS4 ANNUAL FACILITY INSPECTION REPORT
REPORTING PERIOD YEAR 2 (4/1/20 – 3/31/21)

BMP No.	Brief Description of Best Management Practice (BMP)	Measurable Goal	Year 1 Milestone (4/1/19-3/31/20)	Proposed Activity Next Program Year 4/1/20-3/31/21
E.4.1	Training class or workshop for evaluating and inspecting construction site runoff control mechanisms (post-construction).	Director's designee attendance at training class or workshop for evaluating and inspecting construction site runoff control mechanisms (post-construction).	Director's designee attends training. MILESTONE NOT ACHIEVED	Director's designee attends training.
E.5.1	Develop procedures and processes to inspect construction sites for compliance with post-construction runoff control mechanisms.	Develop procedures and processes to inspect construction sites for compliance with approved post-construction runoff control mechanisms.	Develop and implement procedures to inspect construction sites for compliance with approved post-construction runoff control mechanisms. MILESTONE NOT ACHIEVED	Develop and implement procedures to inspect construction sites for compliance with approved post-construction runoff control mechanisms.
F.1.1	Spill prevention protocol.	Conduct annual spill prevention training with appropriate County staff. Track meeting agenda, materials, and attendee sign-in sheet.	Complete annual spill prevention training with appropriate County staff. MILESTONE NOT ACHIEVED	Complete annual spill prevention training with appropriate County staff.
F.1.2	Spill response protocol.	Conduct annual spill response training with appropriate County staff. Track meeting agenda, materials and attendee sign-in sheet.	Complete annual spill response training with appropriate County staff.	Complete annual spill response training with appropriate County staff.
F.1.3	Hazardous material and storage management training.	Conduct annual hazardous material and storage management training with appropriate County staff. Track meeting agenda, materials and attendee sign-in sheet.	Complete annual hazardous material and storage management training with appropriate County staff.	Complete annual hazardous material and storage management training with appropriate County staff.
F.2.1	Prepare a Storm Water Pollution Prevention Plan (SWPPP) for County owned facilities.	Prepare SWPPP for all County owned facilities.	Begin developing the Draft SWPPP for all County owned facilities. MILESTONE NOT ACHIEVED	Begin developing the Draft SWPPP for all County owned facilities.

Survey Intent

The Champaign County MS4 Area Storm Water Survey is administered to identify citizen concerns related to storm water within the Champaign County Urbanized Area. The Champaign County Urbanized Area includes Champaign, Urbana, Savoy, Tolono, Bondville and all the areas located within one half-mile of those municipalities.

The annual survey is conducted to satisfy the Champaign County MS4 Storm Water National Pollutant Discharge Elimination System (NPDES) Annual Facility Report identified best management practice requirement regarding Public Involvement/Participation of Environmental Justice (EJ) Areas within the Unincorporated MS4 Area.

MS4 Environmental Justice Areas with the unincorporated portion of the Champaign County Urbanized Area are updated at the beginning of each calendar year. The Survey is a sampling of those MS4 Environmental Justice Areas with the unincorporated area.

The MS4 Survey is also available to anyone on the Champaign County website. Results from the online Survey are combined with the MS4 Survey of Environmental Justice Areas.

The results of the MS4 Survey are reported in the Annual MS4 Facility Inspection Report for the reporting period in which the MS4 Survey was conducted.

Study Area

Attachment F are maps of the Champaign County Unincorporated Area MS4 Environmental Justice Areas as of February 2020.

Study Area Population

In 2020, Champaign County's MS4 qualifying EJ Parcel jurisdiction is comprised of roughly 3,500 parcels.

Sample Size and Survey Distribution

In April of 2020, a total of 400 surveys were mailed to a randomly selected sample of recipients residing within qualifying Environmental Justice areas of the Champaign County MS4 Area. A reminder post card was later mailed to the same random sample of 400 parcels. A Spanish copy of the survey is available upon request. The survey is also available on the Champaign County Department of Planning and Zoning Storm Water Program webpage.

Response Rate

A total of 56 mailed survey responses and 16 online survey responses were received for a response rate of 18%. A 10%-15% response rate for a survey distributed by mail is considered an average.

Follow-up Contact regarding County Board Review

A total of 20 respondents indicated they wanted to be notified about the Environment and Land Use Committee review of survey results, but only 16 respondents providing legible contact information.

Survey Results

The Survey questions are numbered below as they appear on the Survey. The results are as follows:

Attachment E. MS4 Area Storm Water Survey Results March 31, 2021
CHAMPAIGN COUNTY, ILLINOIS MS4 ANNUAL FACILITY INSPECTION REPORT
 REPORTING PERIOD YEAR 2 (4/1/20 – 3/31/21) APRIL 1, 2021

1. Is there a location in the Champaign County MS4 Area or Urbanized Area where you believe storm water drainage causes a problem during or after a rain event?

44.4% Yes 54.2% No 1.4% No Response

	Location	Within Champaign County MS4 Area?	Type of Problem caused by Storm Water Drainage
1	North of West Church Street between Prospect and Mattis	No (Champaign)	Storm water that causes property damage by flooding a building(s) during large rain events. Storm water in the street that seems to interfere with traffic during large rain events. Storm water so deep that it may be a safety concern during large rain events.
2	Fields South Court and Fields South Drive	Yes	Other: Standing rain on property after large rain events
3	Staley & Farhills	Yes	Storm water that causes property damage by flooding a building(s) during large rain events.
4	913 Crescent Drive & Dodds Park	No (Champaign)	Storm water in the street that seems to interfere with traffic during large rain events.
5	Cherokee Lane & Perkins Road	Yes	Storm water that causes property damage by flooding a building(s) during large rain events. Storm water in the street that seems to interfere with traffic during large rain events. Storm water so deep that it may be a safety concern during large rain events.
6	The Wilbur Heights area. The 2400 Block of Third Street is unpassable, like a lake in the center of the block.	Yes	Storm water in the street that seems to interfere with traffic during large rain events.
7	East Florida Ave, east of Lanore Vine/Cunningham & University	No (Urbana)	Storm water in the street that seems to interfere with traffic during large rain events. Storm water so deep that it may be a safety concern during large rain events.
8	Graham Drive in Savoy; West side of Neil @St. Mary	No Yes (UI)	Storm water in the street that seems to interfere with traffic during large rain events. Storm water so deep that it may be a safety concern during large rain events.
9	Just north of downtown Champaign near PACA	No (Champaign)	Storm water that causes property damage by flooding a building(s) during large rain events. Storm water in the street that seems to interfere with traffic during large rain events. Storm water so deep that it may be a safety concern during large rain events.

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	Location	Within Champaign County MS4 Area?	Type of Problem caused by Storm Water Drainage
10	Highcross Road	Yes	Storm water that causes property damage by flooding a building(s) during large rain events. Storm water in the street that seems to interfere with traffic during large rain events. Storm water so deep that it may be a safety concern during large rain events.
11	MacArthur Court, Urbana	No (Urbana)	Storm water in the street that seems to interfere with traffic during large rain events.
12	Indigo, Savoy	No (Savoy)	Storm water in the street that seems to interfere with traffic during large rain events.
13	Scottswood/ Elm Street, Urbana	Yes	Storm water in the street that seems to interfere with traffic during large rain events.
14	J.T. Coffman Drive south of Interstate Drive	No (Champaign)	Storm water that causes property damage by flooding a building(s) during large rain events.
15	Neil Street south of Springfield Avenue	No (Champaign)	Storm water in the street that seems to interfere with traffic during large rain events.
16	Neil Street	No (Champaign)	Storm water in the street that seems to interfere with traffic during large rain events. Storm water so deep that it may be a safety concern during large rain events.
17	1) West of Bartlow Road on Airport Road, 700 feet to 1,000 feet on north side of road (#68) 2) southeast corner Airport & Bartlow Road and continuing south on Bartlow Road	Yes	Storm water in the street that seems to interfere with traffic during large rain events. Storm water so deep that it may be a safety concern during any rain and large rain events.
18	Corner of Duncan & John (#71)	Yes	Storm water in the street that seems to interfere with traffic during large rain events.
20	Falcon Court and Mumford Drive	No (Urbana)	Storm water from large rain events create a large lake on property resulting in mosquito breeding area and constant sump pump work (#51)
21	Blair Drive east of Duncan Road intersection	No (Champaign)	Storm water that causes property damage by flooding a building(s) during large rain events.
22	Backyard between Lakeview Drive and Cherry Creek Road (#60)	?	After a significant rain a large amount of storm water collects along back property lines, slowly damaging fencing in the process.
26	Duncan and Curtis Road (#62)	Yes	Storm water in the street that seems to interfere with traffic during large rain events.

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	Location	Within Champaign County MS4 Area?	Type of Problem caused by Storm Water Drainage
31	Curtis and Wesley in Savoy (#63)	No (Savoy)	Storm water that causes property damage by flooding a building(s) during any rain and large rain events. Storm water so deep that it may be a safety concern during any rain and large rain events.
32	Ditch that runs parallel to 130 on the west side of Stone Creek Boulevard (#72)	No (Urbana)	Standing water, weeds grow and debris builds up

2. Is there any location in the Champaign County MS4 Area or Urbanized Area where you believe storm water gets polluted?

9.7% Yes 83.3% No 2.8% No Response 4.2% “don’t know”

	Location	Within Champaign County MS4 Area?	Pollution concerns
1	Highcross Road	Yes	Trash on the ground or in the street may wash into the storm sewer system
2	MacArthur Court, Urbana	Yes	Trash on the ground or in the street may wash into the storm sewer system
3	My residence	?	Standing water against my garage (in back) & standing water in front- between the mulch & the grass area
4	2 nd & 3 rd house that sits back off roadway on east side of road has standing water in front & back most of the time (#68)	Yes	Septic system release of sewage (septage) onto the ground or into a stream
5	Airport Road & Landis Farm Road (#70)	No (Urbana)	Trash on the ground or in the street may wash into the storm sewer system Other: sediment from farm field
6	Copper Slough off O’Malley’s Alley	No (Champaign)	Trash on the ground or in the street may wash into the storm sewer system
7	Ditch parallel to 130 on west side of road from Stone Creek Boulevard north (#72)	No (Urbana)	Trash on the ground or in the street may wash into the storm sewer system

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3. Do you recreate at any location in the Champaign County MS4 Area or Urbanized Area where water is a prominent feature?

30.6% Yes

63.9% No

5.5% No Response

	Location	Within Champaign County MS4?	Type of Recreation	Water quality concerns
1	Crystal Lake Park	No (Urbana)	Walking along or near shore Wading and/or swimming Bike ride	Yes: Trash in the water that is unpleasant to see and that causes pollution; Bank or shore erosion that harms the quality of the environment; Other pollution that is visible in the water and that harms the quality of the aquatic environment; Other pollution in the water that may harm either myself or others who may come into contact with the pollution; Catching fish that may be unsafe to eat due to pollution.
2	Lake of the Woods; Kaufman Lake	No (Champaign)	Walking along or near shore	No
3	(no location given)	?	Fishing	Yes: Trash in the water that is unpleasant to see; Bank or shore erosion that harms the quality of the environment
4	Crystal Lake Park	No (Urbana)	Walking along or near shore	Yes: Other pollution in the water that may harm either myself or others who may come into contact with the pollution
5	Park south of Bradley & Mattis	No (Champaign)	Walking along or near shore	Yes: Bank or shore erosion that harms the quality of the environment; Other- lots of Canada geese
6	Englewood	No (Champaign)	Fishing from the shore	No
7	Rising & Windsor	No (Champaign)	Walking along or near shore	No
8	Prairie Winds Circle	No (Champaign)	Other: Pond	No
9	Japan House, south of Florida Ave.	Yes (UI)	Walking along or near shore	No
10	Crystal Lake	No (Urbana)	Walking along or near shore Other: picnic	Yes: Trash in the water that causes pollution
11	Crystal Lake, University Arboretum	No (Urbana) Yes (UI)	Walking along or near shore	No
12	Homer Lake	No	Walking along or near shore	Yes: Trash in the water that is unpleasant to see and that causes pollution;

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	Location	Within Champaign County MS4?	Type of Recreation	Water quality concerns
13	Wesley Avenue & Curtis Road; Arbour Meadows Pond	No	Fishing from the shore	No
14	Kaufman Lake & Dodds Park	No (Champaign)	Walking along or near shore Fishing	No
15	Crystal Lake Park, Boneyard impoundments, Weaver Park	No (Urbana & Champaign)	Walking along or near shore	Yes: Trash in the water that is unpleasant to see.
16	Windsor/ Staley	No (Champaign)	Walking along or near shore	No
17	(no response #70)		Walking along or near shore Fishing	Yes: Trash in the water that is unpleasant to see; Bank or shore erosion that harms the quality of the environment; Catching fish that may be unsafe to eat due to pollution.
18	(no response #71)		Walking along or near shore	Yes (no specificity)
19	Kaufman and Heritage Lakes (#36)	No (Champaign)	Walking along or near shore	No
20	Boulder Drive	No (Urbana)	Walking along or near shore	No
21	The pond in Arbour Meadows off Wesley in Savoy (#63)	No (Savoy)	Walking along or near shore Fishing	Yes: Bank or shore erosion that harms the quality of the environment; Other pollution that is visible in the water and that harms the aquatic environment Arbour Meadows causes constant sump pump operation after rain
22	Crystal Lake Park (#67)	No (Urbana)	Watching birds from vehicle	Yes: Trash in the water that is unpleasant to see and that causes pollution; Other pollution in the water that may harm either myself or others who may come into contact with the pollution. Catching fish that may be unsafe to eat due to pollution.

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4. Please feel free to add any other comments you may have regarding storm water in the Champaign County MS4 Area or Urbanized Area:

Do not know of any problems near me. I try to keep drain clear of leaves at the end of my drive
I live on the South Ridge/Myra Ridge area and have no problem with water when it rains. I ride a bike to the south & east of Urbana, always stopping at bridges to look at creeks, and see a lot of garbage in them. Also, I assume there is also a lot of yard & farm chemicals that make their way into these creeks.
The bridge reconstruction for Phinney Branch at Staley Rd. has constricted water flow during heavy rain events. The Phinney Branch has dramatically changed its boundaries over the last 10+ years. The location of change is just to the east of Staley Rd.
The sewer fee is high in my opinion.
Our drains get clogged with lots of debris and they back up into our driveways & buildings and across our roads- this is hazardous.
(#58) The creek below Duncan Road near John Street gets polluted by trash from area homes. It's been a huge problem for years.

5. Please indicate the nearest street intersection to your home:

- 36.1% in the CC MS4 area**
- 54.2% out of the CC MS4 area**
- 1.4% not specific enough**
- 8.3% No response**

6. Please indicate the major watershed that you live in:

- 50.0% Vermilion Watershed**
- 36.1% Upper Kaskaskia Watershed**
- 8.3% Embarras Watershed**
- 0.0% Upper Sangamon Watershed**
- 0.0% Middle Wabash – Little Vermilion Watershed**
- 5.6% No Response**

7. Would you like to receive notice of the meeting of the Champaign County Board at which the results of this survey will be considered?

- 22.2% Yes, gave contact information**
- 5.6% Yes, gave no contact information**
- 72.2% No response**

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Optional Section

1. Age:

- 0.0% 16-19**
- 5.6% 20-29**
- 5.6% 30-39**
- 8.3% 40-49**
- 16.7% 50-59**
- 30.6% 60-69**
- 16.7% 70-79**
- 5.6% 80-89**
- 1.4% 90+**
- 9.7% No Response**
- 0.0% Husband/Wife combo of different age groups**

2. Gender:

- 48.6% Male**
- 37.5% Female**
- 13.9% No Response**
- 0.0% Husband/Wife combo**

3. Ethnic/Race groups you most identify with (check all that apply):

- 2.8% African American/Black**
- 0.0% American Indian or Alaska Native**
- 1.4% Asian**
- 0.0% Native Hawaiian or Pacific Islander**
- 81.9% White/Caucasian**
- 0.0% Hispanic/Latino**
- 1.4% two or more races**
- 0.0% Other**
- 12.5% No Response**

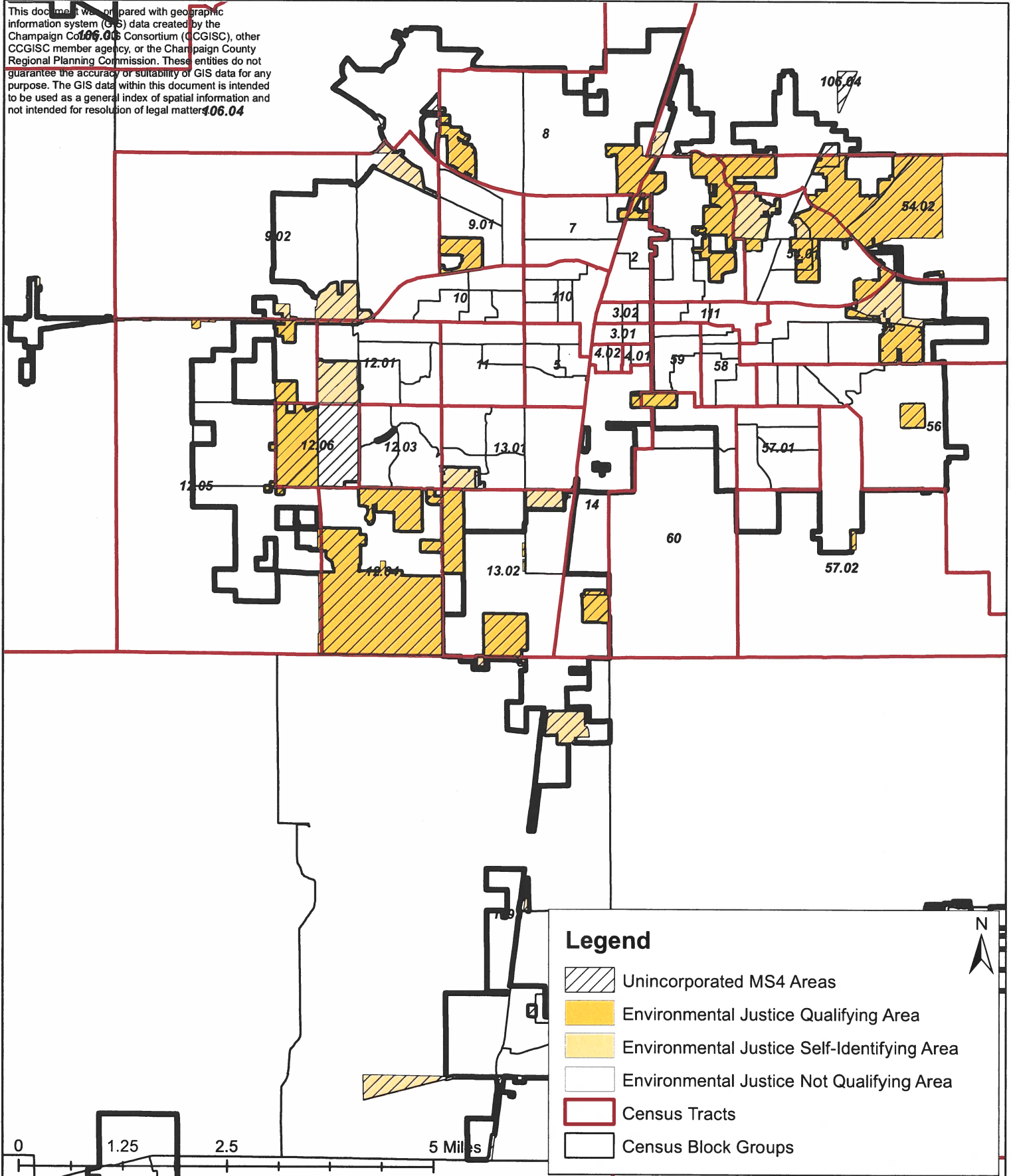
MS4 Environmental Justice Areas: Unincorporated Champaign County

Prepared 14 February 2020

Source: U.S. Census Bureau; 2014-2018 American Community Survey



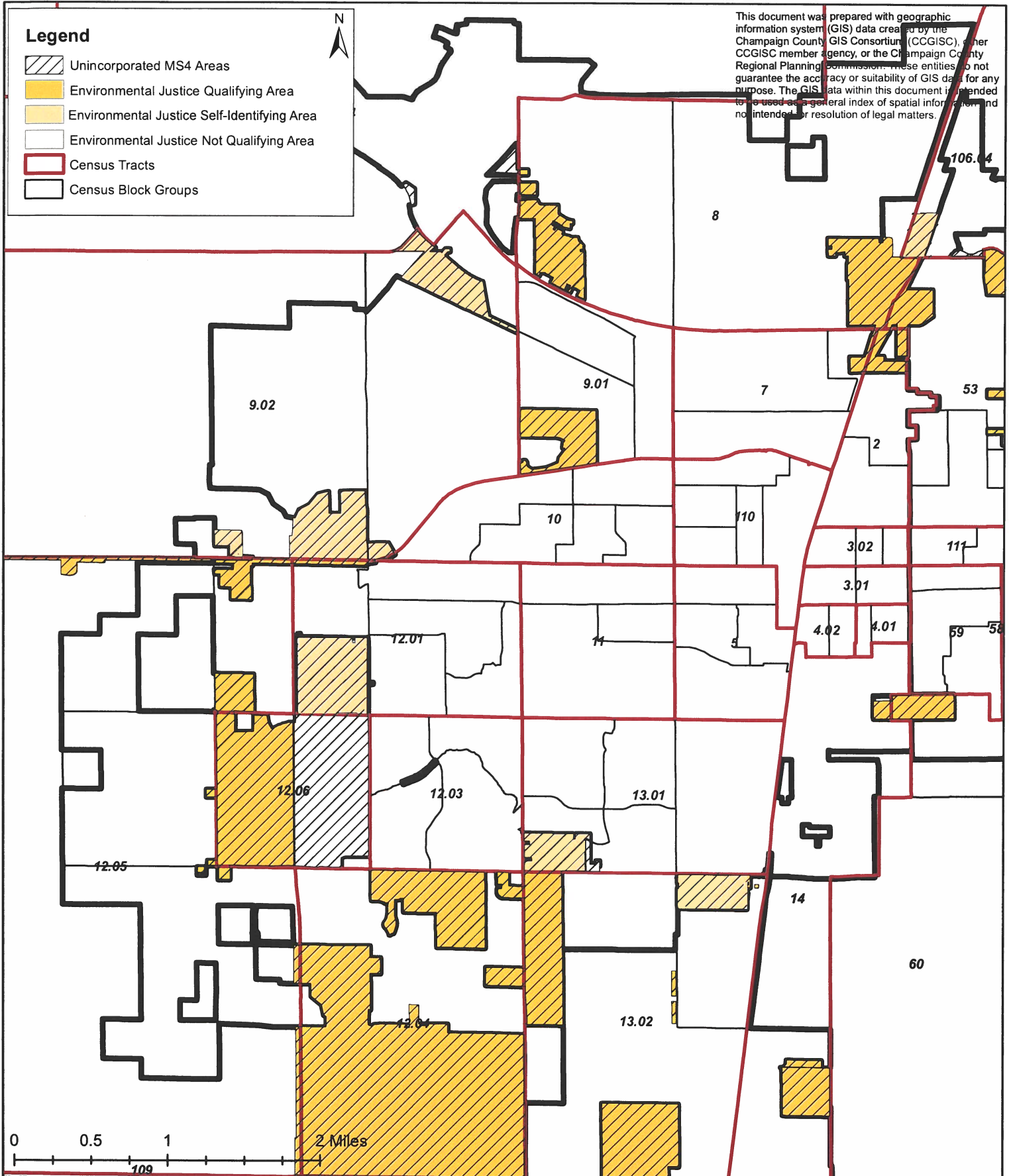
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MS4 Environmental Justice Areas: Champaign Area Detailed Map

Prepared 14 February 2020

Source: U.S. Census Bureau; 2014-2018 American Community Survey



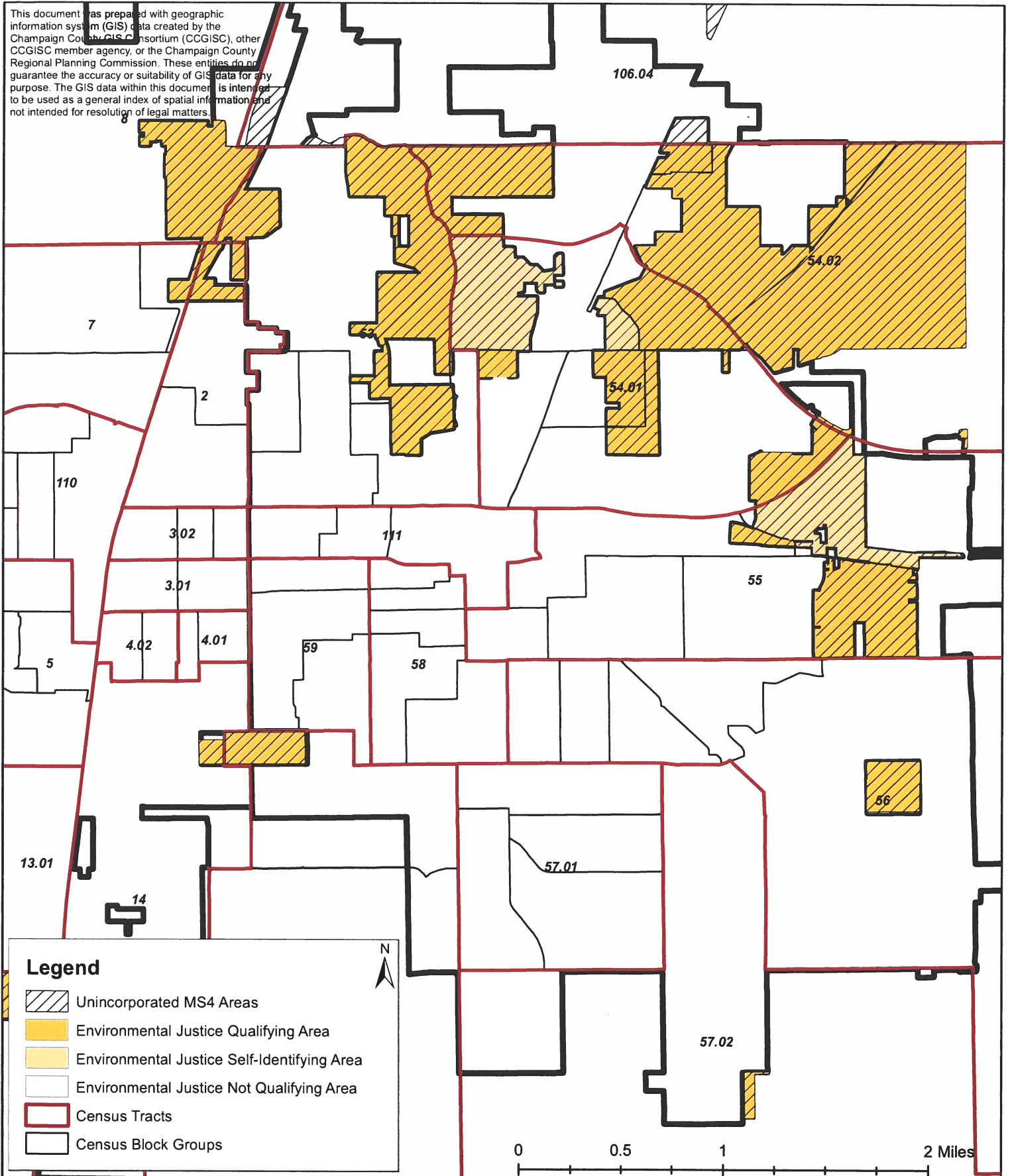
MS4 Environmental Justice Areas: Urbana Area Detailed Map

Prepared 14 February 2020

Source: U.S. Census Bureau; 2014-2018 American Community Survey



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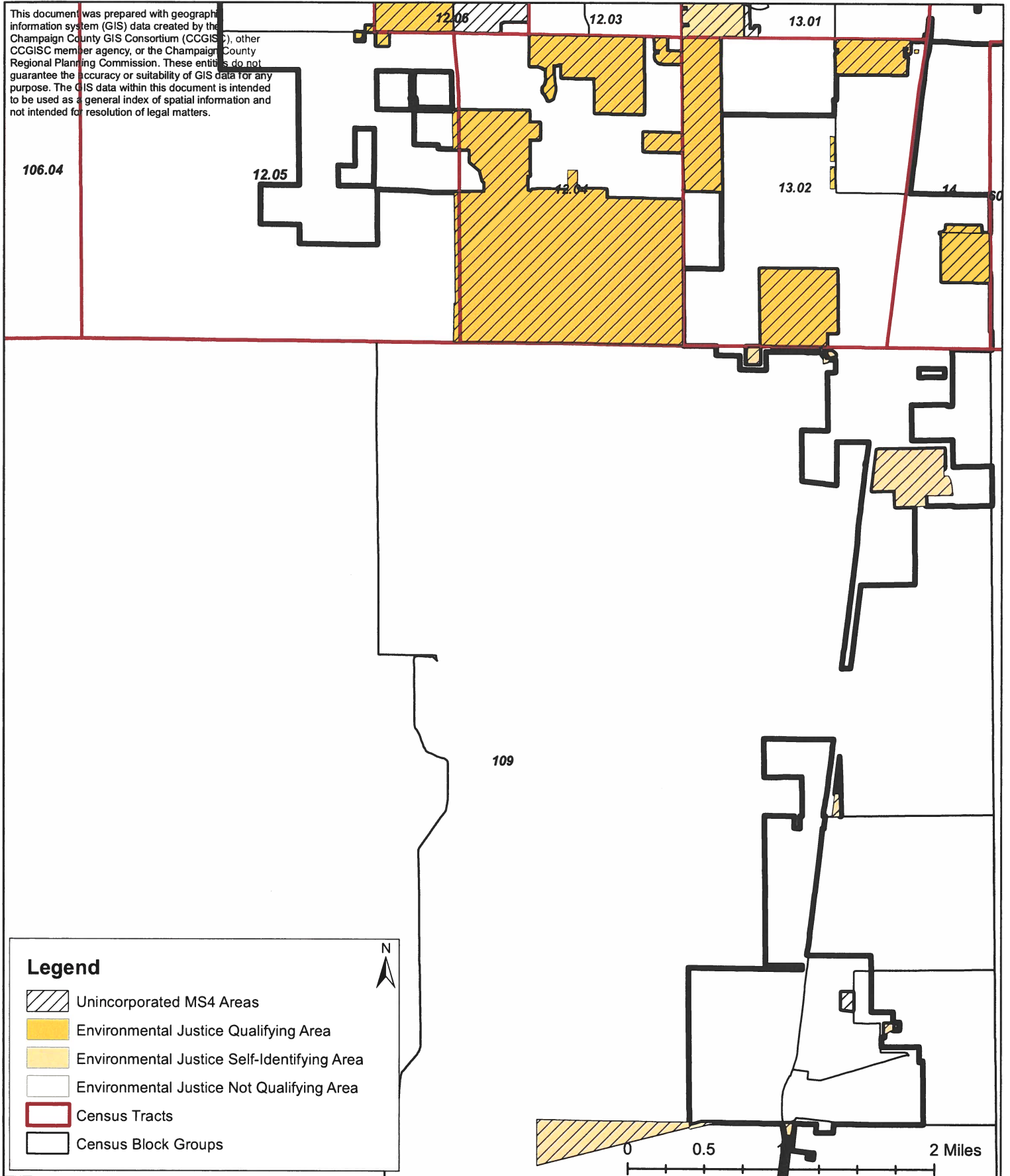
MS4 Environmental Justice Areas: Savoy Area Detailed Map

Prepared 14 February 2020

Source: U.S. Census Bureau; 2014-2018 American Community Survey



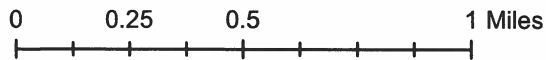
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MS4 Environmental Justice Areas: Bondville Area Detailed Map

Prepared 14 February 2020

Source: U.S. Census Bureau; 2014-2018 American Community Survey



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





9.02

106.04

2.05

Legend



-  Unincorporated MS4 Areas
-  Environmental Justice Qualifying Area
-  Environmental Justice Self-Identifying Area
-  Environmental Justice Not Qualifying Area
-  Census Tracts
-  Census Block Groups