

Storm Water Management Program

Written description as required by NPDES Permit #IDS028177



Your Safety • Your Mobility
Your Economic Opportunity

*Idaho Transportation Department, District 3
8150 Chinden Blvd.
Boise, Idaho 83714*

Contact Information:

*Greg Vitely
208-334-8952
Greg.Vitely@itd.idaho.gov*

*Website:
<https://itd.idaho.gov/env/?target=stormwater>*

Permittee Permit Number: IDS028177

Contents

A. BASIC SWMP INFORMATION (Permit Parts 1 and 2)	4
1.1 Permit Area	5
2.5 Permittee Responsibilities	8
B. STORM WATER MANAGEMENT CONTROL MEASURES (Permit Part 3)	10
3.1 Education, Outreach, and Public Involvement.....	10
3.2 Illicit Discharge Detection and Elimination	12
3.3 Construction Site Runoff Control	14
3.4 Storm Water Management for Areas of New Development and Redevelopment	16
3.5 Pollution Prevention/Good Housekeeping for MS4 Operations	18
C SPECIAL CONDITIONS FOR DISCHARGES TO IMPAIRED WATERS/MONITORING/EXCURSIONS ABOVE IDAHO WQS..	20

ACRONYMS

BMP – Best Management Practices

CWA – Clean Water Act

CGP- Construction General Permit

DAR- Duly Authorized Representative

EPA – Environmental Protection Agency

ERP- Enforcement Response Policy

I - Interstate

IDEQ – Idaho Department of Environmental Quality

ITD - Idaho Transportation Department District 3

IPDES- Idaho Pollutant Discharge Elimination System

MEP – Maximum Extent Practicable

MS4 – Municipal Separate Storm Sewer System

NPDES– National Pollutant Discharge Elimination System

PPBV – Plains, Plateaus, and Broad Valleys Water Quality Site Classification

SH – State Highway

SWMP – Storm Water Management Plan

TMDL – Total Maximum Daily Loads

UA – Urbanized Area

WPCM – Water Pollution Control Manager

WQS – Water Quality Standards

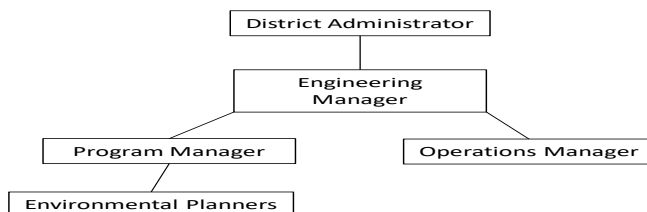
A. BASIC SWMP INFORMATION (Permit Parts 1 and 2)

This Storm Water Management Program (SWMP) Document was developed by the Idaho Transportation Department District 3 (ITD) to meet the terms and conditions of National Pollutant Discharge Elimination System (NPDES) Permit Number IDS028177. The outline of the plan generally follows the Permit outline. The permit covers the Urbanized Areas (UA) as defined by the United States (US) census which in this case includes the larger communities of Nampa, Caldwell, and Middleton. ITD's facilities includes the State Highways (SH) and Interstate (I) through this UA.

ITD has assigned staff who are responsible for the development and implementation of the SWMP. The District Administrator has full authority to operate and delegate within the ITD. The District Administrator is the only one who can sign the Permit. The District Administrator delegates all tasks associated with the SWMP to the Engineering Manager. The Program Manager oversees the SWMP development and implementation. The Engineering Manager also oversees design and construction projects while the Program Manager also oversees scoping and development of projects. Three Environmental Planners assist in development and implementation. The Operations Managers have responsibilities to oversee the maintenance throughout ITD and assist in implementation of the SWMP. The names and titles of those responsible for SWMP implementation are listed below.

District Administrator	Jason Brinkman-Administrator and Certifier
Engineering Manager	Vacant
Operations Managers	Eric Copeland and Michael Garz
Program Manager	Aaron Bauges
Environmental Planner Senior	Greg Vitley-Duly Authorized Representative (DAR)
Environmental Planner	Chris Branstetter-DAR
Environmental Planner	Scott Rudel-DAR

A ITD organizational chart by title is shown below in Figure 1:



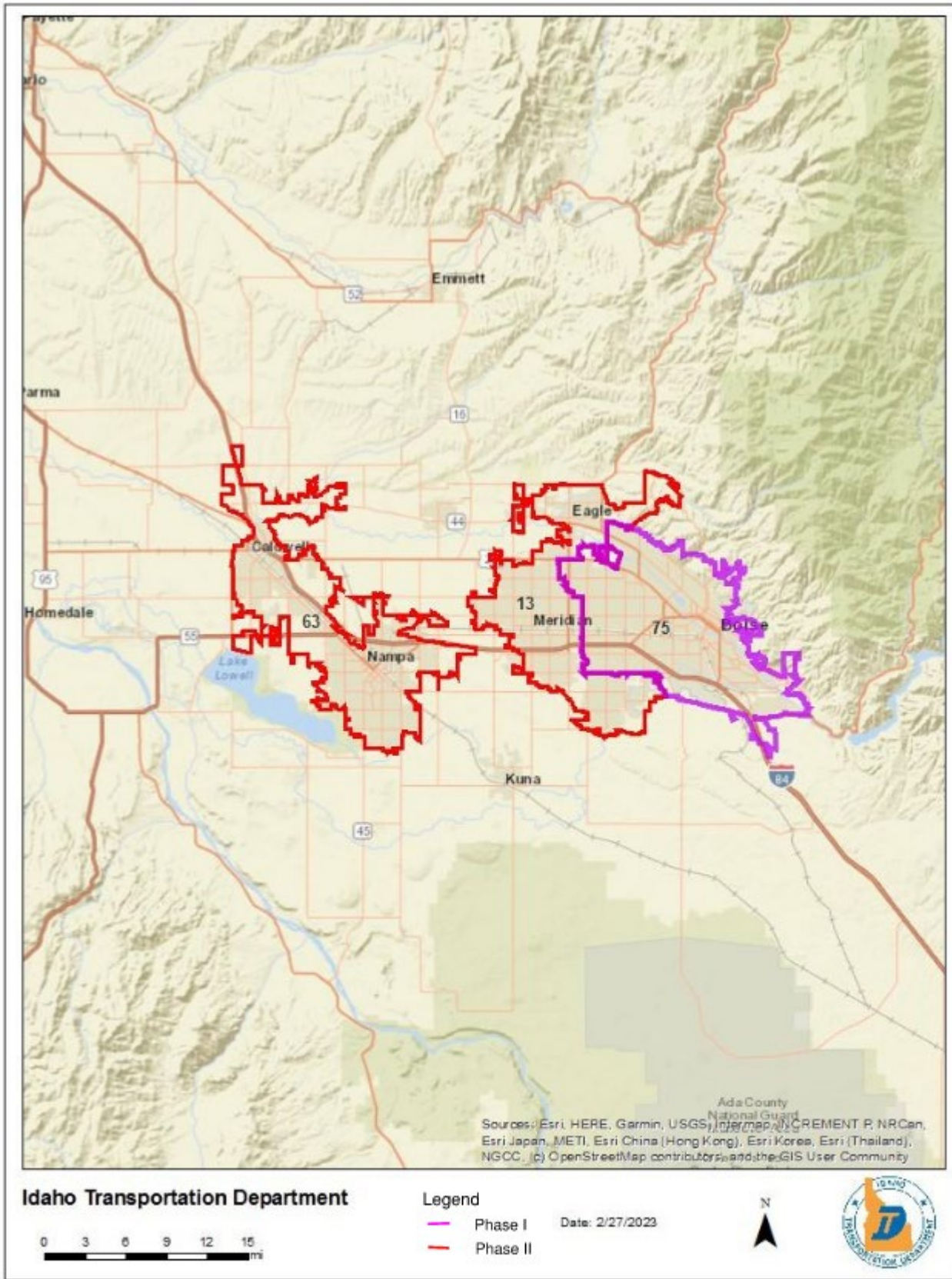
1.1 Permit Area

The topography of the permit area is in the Treasure Valley in the Lower Boise River Watershed. The Boise River flows east to west out of the Boise foothills through the valley, downstream of Lucky Peak and Diversion Dams. The valley has low gradients where the river makes its way through the City of Boise's urbanized area, then continues through a rapidly transitional rural to urban area, then continues through the rural northern side of the City of Caldwell. The approximate population of the three cities in the combined UA is 170,000 per the U.S. 2020 census. The permit area receives approximately 11.6 inches of rainfall per year. ITD has 7 outfalls which discharge into the Boise River and its' tributaries. The approximate drainage area for the lower Boise River is 1,290 square miles, Indian Creek is 233 square miles, Fivemile Creek is 8.41 square miles, and Mason Creek is 4.7 square miles.

ITD's storm sewer system related to this permit includes those systems which it owns and operates for state highways, U.S. highways, and the interstate. The state highways are: SH 45, SH-55, SH-19; U.S. Highway 20/26; Interstate I 84 and portions of I-84 Business Loop which run through the UA. A state statute requires local jurisdictions to maintain systems which run through their jurisdiction when the roadway is an urban section (Idaho Code Title 40-502).

A map of the permit area is shown in Figure 2 below and in the following link:

<https://iplan.maps.arcgis.com/home/webmap/viewer.html?webmap=46eb06baac2c45c682967aaeaccad65f>



Below in Table 1 is a full list of all the perennial streams within the ITD MS4, including their water quality status from IDEQ's 2022 Integrated Report and the number of outfalls that discharge to each stream. All irrigation canals that receive stormwater discharge have also been included.

Table 1: Receiving Water Summary

Receiving Waterbody Segments	WQS Classification	Impairment/Pollutant of Concern	TMDLs? (Yes/No)	No. of Discharging Outfalls
Indian Creek ID17050114SW002_04	PPBV, Not Supporting	Temperature, E. Coli, Sediment, Nutrients	Yes	2
Fivemile Creek	Not Supporting	E. Coli, Sediment, Dissolved Oxygen	Yes	3
Boise River ID17050114SW005_06b	Not Supporting	Temperature, Fecal Coliform, Sediment, Phosphorus	Yes	3
Mason Creek ID17050114SW006_02	Not Supporting	E. Coli, Sediment	Yes	2
Phyllis Canal	No information			3
Wilson Drain	No information			3

2.5 Permittee Responsibilities

ITD does not have formal ordinance authority under Idaho law. Neither does ITD have civil enforcement authority. ITD relies on contract specifications and the Idaho Transportation Department 2023 Standard Specifications for Highway Construction to meet construction permit requirements. ITD manages and maintains state highways under Idaho code Title 40 Highways and Bridges, and Idaho Administrative Code IDAPA 39; ID 40-502 Maintenance of State highways; ID 40-310(3) Board Control of ITD and Statewide Transportation System, and IDAPA 39.03.42 Rules Governing Highway Right-of-Way Encroachments.

<i>ITD relies on the following legal authorities</i>	
<p>1. To prohibit and eliminate illicit discharges to the MS4: (3.2.3)</p>	<p>Through IDAPA 39.03.42 ITD controls third-party activities on highway rights-of-way through conditions associated with encroachment permits. An approved right-of-way encroachment permit is required by outside entities for all work within state highway right-of-way (IDAPA 39.03.42, 600.01) and Best Management Practices are required to control erosion and sediment (IDAPA 39.03.42, 600.01). Unauthorized and nonstandard encroachments are prohibited and can be removed, or use may be suspended (IDAPA 39.03.42, 800.02). This is the provision that gives ITD the authority to control illicit discharges and illegal connections to the MS4.</p>
<p>2. To control the discharge of spills, dumping or disposal of materials other than storm water to the MS4:</p>	<p>Through IDAPA 39.03.42 ITD controls third-party activities on highway rights-of-way through conditions associated with encroachment permits, which are defined as any authorized or unauthorized use of highway rights-of-way or easements..." Encroachment permits are conditioned to require environmental compliance, including implementation of applicable BMPs. Idaho Statute Title 18 Chapter 39 prohibits dumping, littering, and placement of debris or any waste on highways.</p>
<p>3. To control the discharge of storm water and pollutants from land disturbance and development, both during the construction phase and after site stabilization has been achieved</p>	<p>Standard Specifications for Highway Construction Section 107.17; Operations Manual, and Best Management Practices Manual.</p> <p>Intergovernmental Agreement for Roles</p>

	and Responsibilities under the NPDES Municipal Stormwater Permit (Permit #IDS-028177).
4. To control the contribution of pollutants from one MS4 to another interconnected MS4;	Standard Specifications for Highway Construction Section 107.17; Operations Manual, and Best Management Practices Manual.
5. To require local compliance with such requirements; and	Standard Specifications for Highway Construction Section 107.17.
6. To carry out all inspection, surveillance, and monitoring procedures necessary to determine compliance and noncompliance with the Permit.	Idaho Code Section 40-310 (3) vests the Idaho Transportation Board with the authority, control, supervision, and administration of the Idaho Transportation Department. The Board shall “locate, design, construct, reconstruct, alter, extend, repair, and maintain state highways, and plan, design, and develop statewide transportation systems”. This provision gives ITD the mechanism to carry out inspection, surveillance, and monitoring procedures to determine compliance and noncompliance with the permit.

B. STORM WATER MANAGEMENT CONTROL MEASURES (Permit Part 3)

The following sections describe ITD's program to reduce pollutants in the MS4 discharges to the Maximum Extent Practicable (MEP), as required by Part 3 of the Permit. Each section summarizes the mandatory program and describes how ITD meets each program component.

It is expected that over the course of the permit, individual permittees may expand or reduce their jurisdictions within the MS4 area. All Permittee land ownership changes and jurisdictional annexations will be detailed in each Annual Report and the MS4 map will be updated accordingly. There have been no changes or additions to the ITD MS4 area in this reporting period.

3.1 Education, Outreach, and Public Involvement

This control measure educates and involves members of the public about pollutants in storm water and similarly significant issues. ITD must conduct, or contract with other entities to conduct, an ongoing education, outreach, and public involvement program. ITD must also comply with applicable State and local public notice requirements when implementing any public involvement activities.

Within a year ITD must begin to implement the following education, Outreach, and Public Involvement Activities:

- Select at least one audience and focus its efforts on conveying relevant messages
- Distribute and/or offer at least eight (8) educational messages or activities over the permit term to selected audience(s)
- Begin to assess, and track, activities to gauge the audience's understanding of the relevant messages and adoption of appropriate behaviors.
- Target specific educational material to the construction/engineering/design community regarding construction site runoff control and permanent storm water controls.
- Maintain and advertise a publicly accessible website to provide all relevant SWMP materials.

The ITD has developed or contributed in the development of several educational materials for distribution to the public and/or entities we work with to educate them about how to keep stormwater clean and the importance of doing so. These materials are noted below and will be located on the ITD public website in a downloadable format. Some materials are selected for printing and distribution in public meetings; others are used in construction meetings, and training.

The ITD has determined the following target audiences and associated topics are most relevant to our agency:

A. General Public

- Litter and trash control.
- Impact of illicit discharges and how to report them.

B. Construction/Development

- General impacts of stormwater flows into surface water, and appropriate actions to prevent adverse impacts.
- Impacts from ground disturbing activities and appropriate techniques to avoid adverse impacts.
- Internal and external stormwater pollution control plan development, review, implementation, and enforcement training.

C. Elected Officials, Land Use Policy and Planning Staff

- General impacts of stormwater flows into surface water, and appropriate actions to prevent adverse impacts.
- What is an MS4 and what is ITD responsibility?

ITD has begun to develop/distribute education and outreach materials related to construction and development on February 1, 2020. An erosion and sediment control field guide has been updated which shows appropriate uses of BMP's. This field guide is being developed for distribution in training classes and to construction contractors. Additionally, various pamphlets and fliers will be made available for download through the ITD stormwater website. ITD intends to translate the field guide into Spanish to reach that community. A tri-fold flier been updated for contractors and which has general information about the Construction General Permit requirements.

ITD D3 will assess, track, and gauge the success of our educational materials to target audiences by the number of materials distributed, offered, or requested. ITD will note any positive or negative feedback related to the topics/material.

ITD maintains a publicly accessible website located at <https://itd.idaho.gov/env/?target=stormwater> ITD will actively maintain and update the website. The website will provide links to downloadable stormwater educational and outreach materials in addition to providing information about the ITD's stormwater program including: contact information, available training, links to other MS4 Permittees in the Treasure Valley, Storm Water Management Program, and Annual Reports.

ITD has established contacts with other MS4 Permittees in the Phase II area for information sharing.

Throughout the year the ITD may modify the materials, methods of distribution, and target area to best suited the audiences. The topics and selected audiences will be determined by those in charge of the ITD MS4 program. As the education and outreach materials are completed, they will be provided in the Annual Report.

Intended Compliance Schedule

- ✓ Complete education and outreach for 8 topics by April 4, 2025.
In this past year, ITD updated the field guide and tri-fold flier which can be seen on the ITD website. ITD D3 also updated their public webpage with links and/or downloadable educational materials. The education and outreach materials are directed towards the public and the construction development community. By April 4, 2025 ITD will complete 6 more education and outreach activities related to stormwater from the list of topics and associated target audiences noted above.

3.2 Illicit Discharge Detection and Elimination

The ITD Standard Specifications for Highway Construction requires compliance with all applicable local, state, and federal laws, ordinances, regulations, orders and decrees, which would include detection, reporting and elimination of illicit discharges into the MS4 under the NPDES program and associated local ordinances. The ITD BMP Manual directs state forces and contractors in the identification of and actions to address illicit discharges (NS-6 Illicit Connection/Illegal Dumping or Discharge).

Spill reporting and response is handled as part of project contract requirements, ITD BMP Manual Waste Management chapters, and as per applicable codes and ordinances where the state roadway facility is located.

ITD monitors and controls activities that occur within the highway right-of-way of I-84 and state highways. There are no private parcels that have direct access to or connect with I-84. ITD does not regulate land uses or establish storm water regulatory policy on private land adjacent to the right-of-way. While there is some exposure to possible acts of illicit discharges within the right-of-way, public access to I-84 and state highways are highly visible and restricted, which reduces the likelihood of the illicit discharges. ITD's illicit discharge monitoring program involves the continuation of surveillance efforts provided by ITD maintenance staff and other agency representatives as they travel through or maintain these roadways. Additionally, ITD will evaluate the general condition of the MS4 water quality conditions during sampling events and note any unusual conditions or special concerns related to the potential for illicit discharges to the system.

Intended Compliance Schedule

- ⊗ Submit Monitoring/Assessment Plan completed.
- ✓ Implement at least 2 pollutant reduction activities by August 4, 2025. On February 1, 2023, ITD requested 2 pollutant reduction activities. ITD is meeting the schedule for compliance.
- ✓ Submit Summary of Final Monitoring/Assessment Reports by August 4, 2025.
ITD is not on schedule for submittal of the Monitoring and Assessment Plan but intends to submit what they have by the required compliance date.

Mapping of the ITD's MS4 system is ongoing. Mapping is being verified and outfalls confirmed. The 16 outfalls previously noted above are those ITD provided to EPA based on the existing maps. The mapping has been updated and it indicates that ITD currently has 8 shared outfalls and 7 other outfalls that serve ITD's jurisdiction only. Table 2 updates the ITD outfalls for the reporting period. The link below is ITD's public facing map of the Phase II MS4.

[MS4 Viewing Map \(arcgis.com\)](#)

Table 2: ITD Outfall Inventory Update Table, Phase II

Count	ID	Location	Receiving Water	Jurisdiction/comments
1	02-16	43.67796222, -116.6983296	Boise River	ITD
2	02-09	43.548896, -116.572491	Wilson Drain	Shared with Nampa,
3	02-11	43.58805136, -116.5777896	Phyllis Canal	Shared with Nampa
4	02-03	43.58784187, -116.5774506	Phyllis Canal	Shared with Nampa
5	02-04	43.58863675, -116.5786499	Phyllis Canal	Shared with Nampa
6	02-05	43.58629437, -116.5518097	Mason Creek	Shared with Nampa
7	02-01	43.547302, -116.572416	Wilson Drain	Shared with Nampa
8	02-08	43.547338, -116.572338	Wilson Drain	Shared with Nampa
9	02-06	43.583837, -116.557678	Indian Creek	ITD
10	02-15	43.680724, -116.689554	Boise River	ITD
11	02-14	43.680724, -116.689194	Boise River	Shared with Nampa
12	02-10	43.594108, -116.357101	Five Mile Creek	ITD
13	02-12	43.594017, -116.356782	Five Mile Creek	ITD
14	02-02	43.593386, -116.355731	Five Mile Creek	Unknown
15	02-07*	43.599697, -116.558027	Mason Creek	ITD
16	02-13	43.673802, -116.702409	Indian Creek	ITD

Orange indicates change.

*Indicates a new outfall.

Intended Compliance Schedule

- ✓ Mapping of the MS4. ITD has a map of their MS4 but are continually working on confirming/verifying the facilities.
- ✓ An Illicit Discharge and Detection Program has been completed.
 - Complaint and Response Program
 - Dry Weather Outfall Screening Program has been completed
 - Illicit Discharge Training intended to be completed April 4, 2025.

3.3 Construction Site Runoff Control

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

- ✓ Require appropriate erosion, sediment, and waste management requirements for construction site activity that results in land disturbance of 5,000 square feet (ft²) or more.
- ✓ Establish installations and use guidelines for required erosion/sediment/waste management during all phases of construction site activity.
- ✓ At a minimum, review preconstruction site plans for construction sites that will result in land disturbance of one (1) or more acres, using a checklist or similar process to consider and address potential water quality impacts from the site activities.
- ✓ Inspect and enforce erosion, sediment, and waste management requirements on construction sites.
- ✓ Establish an inspection prioritization plan
- ✓ Establish an enforcement response policy,
- ✓ Ensure that Permittee staff are trained to conduct these activities.

ITD requires construction site operators to control erosion and waste at construction sites disturbing 1 acre or more. ITD has establish installation and use guidelines for erosion, sediment, and waste management during all phases of construction activity.

Contract language is placed in the construction contracts which requires contractors to follow local, state, and federal regulations for control of erosion, sediment, and waste pertaining to ITD projects. ITD implements best management practices based on the ITD Best Management Practices Manual. To support effective implementation of the Construction Site Stormwater and Erosion and Sediment Control requirements, the following manuals are utilized by Permittee staff implementing the program.

Idaho Transportation Department Best Management Practices Manual
<https://itd.idaho.gov/env/?target=resources/>

Standard Specifications for Highway Construction, Sections 107.17, 212, 620, and 621
<https://itd.idaho.gov/business/?target=construction-resources#standard-specifications-for-highway-construction>

ITD conducts pre-construction site plan reviews for all projects. ITD maintains policy that requires all projects to have sediment and erosion control protocols in place during construction. Any ITD project must either have a Pollution Prevention Plan (PPP) or Stormwater Pollution Prevention Plan (SWPPP). Each PPP or SWPPP is reviewed prior to construction by a qualified individual and documentation of the review process is tracked. ITD specifications require stormwater plans be approved by ITD staff prior to

commencing construction.

ITD informs a construction project proponent to obtain the NPDES Construction General Permit coverage for sites disturbing one acre or more-

If a project disturbs over 1 acre and discharges to Waters of the US, the project requires a National Pollutant Discharge Elimination System Construction General Permit (CGP). The requirement to obtain the CGP is put in the construction contract. If a project exceeds 1 acre of ground disturbance during construction a CGP must be obtained. Erosion and Sediment Control Plans are required on project that do not exceed 1 acre and discharge into Waters of the US. Both ITD and the contractor are required to apply for the project.

ITD enforces its own local erosion, sediment, and waste management control requirements on construction sites disturbing at least 1 acre or more-

The ITD does not have civil enforcement authority so it relies on contractual language which requires adherence to local, state, and federal regulations. Projects are inspected on a regular basis for proper installation of BMP's and implementation of the Storm Water Pollution Prevention Plan (SWPP). Maintenance needs are documented and corrected within 24 hours. Potential violations of the Clean Water Act (CWA) are reported within 24 hours to the Idaho Department of Environmental Quality (IDEQ). All waste materials are disposed of per local and state standards.

Construction sites are prioritized for inspection-

The ITD has a full construction staff who are trained to inspect CGP projects. These Water Pollution Control Managers (WPCM) and Inspectors are assigned discrete projects to inspect within their current workload ability; therefore, all projects get inspected in a timely manner. Prioritization greatly depends on the project location, slope, drainage patterns, soil conditions, precipitation, temperature, etc. Additionally, if assistance is requested, the ITD Environmental Planners can visit the construction sites to provide input and recommendations for adherence to the permit requirements.

ITD Enforcement Response Policy (ERP)-

ITD does not have an ERP for construction projects. ITD does not have civil enforcement ability so we rely on contract language, permit requirements, and regulatory agencies as appropriate for enforcement actions. ITD does have robust contract language to address adherence to the CGP. Needed corrective actions are recorded and corrected. Potential violations of the CWA are reported within 24 hours to the IDEQ. Corrections are made within 24 hours.

ITD Operations and Engineering staff complete required training on basic environmental compliance and pollution prevention as new employees. ITD District and HQ trainers manage the environmental training and certification program for ITD. ITD maintains its own stormwater training program for ITD staff titled NPDES inspector training course 3.07. Any ITD inspector must hold a current ITD certification to inspect an ITD project. ITD also requires any contractor working on an ITD project to hold proper stormwater training, including ITD's Water Pollution Control Manager (WPCM) Certification. More detail can be found on the ITD Storm Water Page: <https://itd.idaho.gov/env/?target=stormwater#stormwater-inspector-requirements>.

- ✓ ITD has a strong Construction Runoff Control Program. ITD reviewed 3 SWPPP's and Plans for the permit area for project Keys (22165, 23080, and 23081) and conducted 83 on field inspections with no need for escalation.

ITD will update its existing construction site runoff control requirements to implement Parts 3.3.2 to 3.3.7. this entails the following:

- Provide a regulatory mechanism that requires erosion controls, sediment controls, and waste materials management controls be incorporated on construction projects.
- Comply with NPDES CGP Permit Requirements.
- Create construction site runoff control specifications.
- Conduct pre-construction plan reviews.
- Conduct construction site inspections and enforcement.
- Have an enforcement response policy (ERP).
- Provide construction runoff control training for staff.

ITD can control construction site runoff through contract specifications and existing state and federal laws. Where applicable ITD requires a CGP and where a CGP is not required we implement a PPP. Specifications for construction site runoff are in the contract as well as in the ITD Erosion and Sediment Control Manual. Each CGP or PPP project has the erosion and sediment control plan and plan sheets reviewed for adequacy by trained staff and corrections are made prior construction. Inspections are done by the contractor and/or an ITD staff and if corrections are needed in the BMP's a corrective action is noted and followed up on. If BMP's aren't getting corrected in a timely manner, ITD can enforce the contract by delaying payment or charge the contractor per the contract. All construction inspection staff are trained on a regular basis.

3.4 Storm Water Management for Areas of New Development and Redevelopment

ITD will implement and enforce a program to control stormwater runoff from new development and redevelopment projects that result in land disturbance from one or more acres (or are part of a larger common plan of development over one acre). This program must apply to private and public sector

development, including roads and streets. The program must ensure that permanent controls or practices are utilized at each new development and redevelopment site to protect water quality.

To control the discharge of storm water and pollutants from land disturbance and development, after construction is completed, ITD must:

- Require the installation and long-term maintenance of permanent storm water controls at new development and redevelopment project sites that result from land disturbance of 1 acre or more.
- Permanent storm water controls must be sufficient to retain onsite the runoff volume produced from a 24-hour, 95th percentile storm event; or sufficient to provide the level of pollutant removal greater than the pollutant removal expected by using onsite retention of runoff volume produced from a 24 hour, 95th percentile storm event.
- Alternatively, storm water treatment requirements must be required that can attain an equal or greater level of water quality benefits as onsite retention of storm water discharges from new development and redevelopment sites.
- Other alternatives may be allowed for projects to meet the onsite retention requirement at a particular project site based on technical infeasibility, and/or site constraints.
- Establish proper installation and use guidelines for permanent storm water controls – the Permittee may establish different types of controls for different types and/or sizes of site development activity.
- At a minimum, review and approve preconstruction plans for permanent storm water controls at new development and redevelopment sites that result from land disturbance of one (1) or more acres
- Periodically inspect “high priority” permanent storm water controls for proper installation and operation, using an inspection prioritization system
- Maintain an inspection prioritization plan and enforcement response policy,
- Maintain a database inventory to track and manage the operational condition of permanent storm water controls
- Ensure the appropriate Permittee staff is trained to conduct these activities.

ITD design development and construction follow the ITD Roadway Design Manual and applicable federal, state, and local requirements for stormwater facility design to provide permanent controls of the discharge of stormwater and pollutants from land disturbance and development. This activity is overseen by staff in the District Engineering and Environmental Departments. The operation and maintenance of public stormwater facilities within the MS4 area are achieved per state-local agreement and in accordance with the ITD Operations Manual, BMP Manual, and engineering standards.

Work by state forces complies with applicable federal, state, and local requirements, the ITD Operations Manual and as directed by ITD engineering staff. Various District staff from Operations, Planning (including GIS Analyst) and Engineering, in coordination with City staff, contribute to maintaining the stormwater facility inventory for ITD within the MS4 area.

- ✓ ITD needs to do the following to be in full compliance with this control measure: Integrate inspection and maintenance activities with ITD's asset management tracking system and identify permanent stormwater facilities connected to the MS4. Intended Compliance Schedule is August 4, 2025.

3.5 Pollution Prevention/Good Housekeeping for MS4 Operations

To properly operate and maintain the MS4, and its facilities using prudent pollution prevention and good housekeeping, ITD must:

- ✓ Maintain a current Map of the MS4, including an inventory of all Outfalls and other features.
- ✓ Inspect catch basins and inlets at least once every five years. The prioritization of inspections is based on functionality of the catch basin, how direct the inlet connection is to Waters of the United States, past inspection logs.
- ✓ Maintain or cleans catch basins based on those inspections,
- ✓ If applicable, maintain Operation and Maintenance (O&M) Procedures for Streets, Roads, Highways and Parking Lots, including:
 - If applicable, inventory and manage Street/Road Maintenance Materials
 - If applicable, implement a Street, Road, Highway and Parking Lot Sweeping Management Plan.
 - Maintain O&M Procedures for Other Municipal Areas and Activities to protect water quality.
 - Uses BMP's to reduce the discharge of pollutants to the MS4 associated with the Permittee's application and storage of pesticides, herbicides, and fertilizers.
 - Develop site-specific Pollution Prevention Plans for Permittee-owned Facilities.
 - Work cooperatively with other entities to control litter on a regular basis.
 - Ensure the appropriate Permittee staff is trained to conduct these activities.

ITD maintains their MS4 and related facilities to reduce the discharge of pollutants from the MS4 to the MEP. All Permittee-owned and operated facilities must be properly operated and maintained. This maintenance requirement includes, but is not limited to, structural stormwater treatment controls, storm sewer systems, streets, roads, parking lots, snow disposal sites, waste facilities, and street maintenance and material storage facilities.

The operation and maintenance of public roadways and stormwater facilities within the MS4 area are achieved as per state-local agreement and in accordance with ITD's Operations Manual, ITD BMP Manual, and current engineering standards.

The street sweeping management plan will be added to SWMP or permittee's website. This includes a map of all streets that discharge to the MS4 and their street sweeping frequency, a description of all street sweeping activities including types of sweepers used, lane miles swept, general schedule by sweeping frequency, and weight of materials collected.

ITD aims to minimize risk and potential pollution from pesticide, herbicide, and fertilizer applications. Only staff with ISDA licensure for chemical applicators can plan, initiate, and supervise pesticide and herbicide spraying. All contracts and state forces work are required to comply with applicable federal, state, and local requirements and to follow manufacturer instructions and BMPs for pesticide, herbicide, and fertilizer applications.

ITD operates two maintenance yards which includes material storage, equipment storage, and vehicle maintenance areas. While the ITD facilities do not drain to Waters of U.S. they are managed in accordance to pollution prevention best practices as per ITD Operations Manual and any applicable federal, state, and local requirements.

ITD complies with applicable federal, state, and local requirements, the ITD Operations Manual, and ITD BMP Manual on litter control. ITD's Maintenance Yards contracts with the local jurisdiction for garbage disposal and recycling services.

ITD operates an Adopt-a-Highway Program where volunteers and Ada County Corrections pick up litter off the state highways and the interstate. More information about this program can be found on the ITD website. This permit period the ITD Adopt-a-Highway Program collected 42,891 pounds (21.4 tons) of highway garbage.

Intended Compliance Schedule

- ✓ Update SWMP with sweeping management plan by August 4, 2025.
Includes required maintenance schedules being integrated into ITD's operating standard operating procedures.
- ✓ Submitted description of selected Pollutant Reduction Activities.
Pollutant reduction Activities were submitted on February 1, 2023. They included Centennial Interchange Storm Drain in the Caldwell UA and Indian Creek Wetlands project within the Nampa UA.
- ✓ Implement at least 2 pollutant reduction activities by August 4, 2025.

C. Special Conditions for Discharges to Impaired Waters/Monitoring Excursions above Idaho Water Quality Standards

(Permit Parts 4, 5 and 6)

The following sections describe ITD's quantitative monitoring/assessment and pollutant reduction activities designed to assess and control impairment pollutants in our MS4 discharges to Mason Creek, Indian Creek, Fivemile Creek, and the Boise River.

Monitoring/Assessment of MS4 Discharges to Impaired Waters

SWMP Information and Statistics

ITD tracks their information with multiple databases, spread sheets, and forms. The ITD will track website use including downloads and comments. ITD keeps construction and inspection records which document expectations, performance, enforcement, and results. ITD maintains records from storm water complaints and how they are addressed.

Monitoring locations will be selected to enable monitoring of stormwater sediment loads from the Boise River, Indian Creek, or Mason Creek, partition loads between urban stormwater sources, agricultural return flow and sources from upstream of the urban area.

Members of the public will not be engaged in the monitoring due to the technical nature of the data acquisition; however, the monitoring may be discussed at regular outreach events.

Data will be analyzed annually for trends, with a summary in each Annual Report. It will include raw data, as well as a visual and narrative summary of the data interpretation, any quality assurance issues, and a narrative discussion comparing this data with any historical information, as appropriate.

The ITD submitted a Monitoring/Assessment Plan (MAP) that is designed to quantify, at a minimum, pollutant loadings from the MS4 into the Boise River, Indian Creek, Fivemile Creek, and Mason Creek for sedimentation/siltation. Along with the MAP, a Quality Assurance Plan Program (QAPP), and an Illicit Discharge Elimination Plan (IDDE) have been completed. The MAPP will be made available on the ITD Stormwater Page.

The ITD contracted out wet weather monitoring through the remaining permit term. This includes monitoring stormwater turbidity and suspended sediment loads, as well as the effects of any stormwater treatment on those loads.

Annual Compliance Evaluation

ITD will post the Annual Report and SWMP on the ITD Stormwater page for public access.

The ITD has reviewed the requirements for the third permit term and have met the conditions of *the permit*.

Alternative Control Measure Requests

Alternative control measures are not being considered at this time.

Adaptive Management Actions

At this point in the permit cycle ITD does not have any adaptive management actions to consider.

- ✓ Submit Summary of Final Monitoring/Assessment Reports by August 4, 2025.