

Storm Water Management Program

Written description as required by NPDES Permit #IDS027561



**Your Safety • Your Mobility
Your Economic Opportunity**

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Permittee Permit Number: IDS027561

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ACRONYMS

BMP – Best Management Practices

CWA – Clean Water Act

I - Interstate

IDEQ – Idaho Department of Environmental Quality

ISDA-Idaho State Department of Agriculture

ITD - Idaho Transportation Department District 3

MEP – Maximum Extent Practicable

MS4 – Municipal Separate Storm Sewer System

NPDES CGP – National Pollutant Discharge Elimination System Construction General Permit

NOI-Notice of Intent

PPP-Pollution Prevention Plan

SH – State Highway

SWMP – Storm Water Management Plan

SWPPP- Storm Water Pollution Plan

TMDL – Total Maximum Daily Loads

WLA – Waste Load Allocation

WPCM – Water Pollution Control Manager

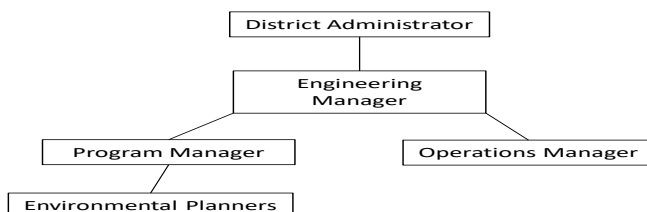
A. BASIC SWMP INFORMATION (Permit Parts 1 and 2)

This Storm Water Management Program (SWMP) Document was developed by the ITD to meet the terms and conditions of NPDES Permit Number IDS027561. 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 city limits of City of Boise. Facilities includes Interstates and State Highways (SH) through the City.

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	Caleb Lakey-Administrator and Certifier
Engineering Manager	Jason Brinkman-Certifier
Operations Managers	Eric Copeland and Michael Garz
Program Manager	Aaron Bauges
Environmental Planner Senior	Greg Vitley- Designated Authorized Representative
Environmental Planner	Chris Branstetter-Designated Authorized Representative
Environmental Planner	Scott Rudel- Environmental Planner

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



1.1 Permit Area

The permit area is the Boise City Limits. 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. The approximate population of the City of Boise from the April 1, 2020 census was 235,684. The permit area receives approximately 11 inches of rainfall per year. ITD has 3 outfalls which discharge into the Boise River and its' tributaries. The approximate drainage area for the lower Boise River is 1,290 square miles.

ITD's storm sewer system related to this permit includes those which the State uses to operate the interstate and State Highways. These roadways are: State Highways (SH) 44, 55; U.S. Highway 20/26; and Interstates (I) 184 and 84. 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 below in Figure 2.

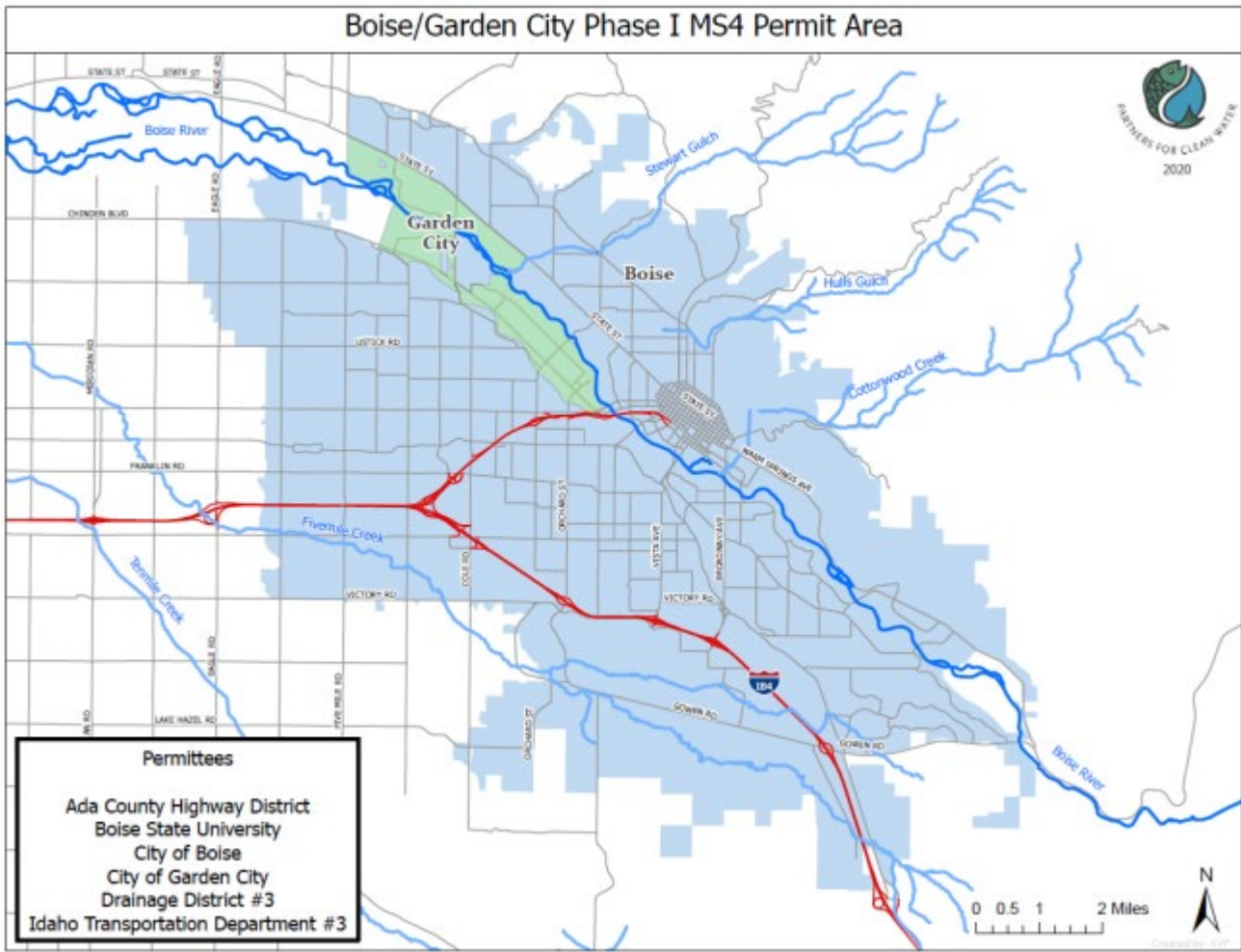


Figure 2

Below is a full list of all the perennial streams or other drainages within the 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: Receiving Water Summary

Receiving Waterbody Segments	Impairment/Pollutant of Concern	TMDLs? (Yes/No)	Applicable WLAs (Yes/No)	No. of Discharging Outfalls
Lower Boise River	Sediment, Fecal Coliform	Yes	Yes	2
Ridenbaugh Canal	NA	No	No	1

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 2018 Standard Specifications for Highway Construction to meet 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. See below for ITD legal authorities:

<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 and Responsibilities under the NPDES Municipal Stormwater Permit (Permit #IDS027561).</p>
<p>4. To control the contribution of pollutants from one MS4 to another interconnected MS4;</p>	<p>Standard Specifications for Highway Construction Section 107.17; Operations Manual, and Best Management Practices Manual.</p>
<p>5. To require local compliance with such requirements; and</p>	<p>Standard Specifications for Highway Construction Section 107.17.</p>
<p>6. To carry out all inspection, surveillance, and monitoring procedures necessary to determine compliance and noncompliance with the Permit.</p>	<p>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.</p>

ITD spent \$30,000 on the implementation of the permit in this reporting year. ITD works with the other local and state agencies to coordinate compliance with the permit. See Table below:

Coordinated Compliance Activities		
Agency	Summary of Activities	SWMP Control Measures
City of Boise	Enforcement of Illicit Discharge	Illicit Discharge
City of Garden City	Enforcement of Illicit Discharge	Illicit Discharge
Idaho Department of Environmental Quality	Enforcement assistance in illicit discharge response related to hazardous materials, petroleum products, dust control, and erosion and sediment control.	Illicit Discharge, Construction
Public	Report illicit discharges, participate in education and activities.	Education and Outreach, Public Participation, Illicit Discharge
City of Boise, Garden City, Drainage District 3, Boise State University, Ada County Highway District	“Co-permittees” responsible for governance. Each entity is responsible for their own compliance with the permit. Some control measures are shared.	Public Education and Wet Weather Monitoring.

B. STORM WATER MANAGEMENT PROGRAM CONTROL MEASURES

(Permit Part 3)

The following sections describe ITD's program to reduce discharge of pollutants to the MS4 to the maximum extent practicable, as required by Permit Part 3. Each section summarizes the mandatory program and describes how ITD meets each program component below it. 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 Public Education and Outreach on Stormwater Impacts

ITD must conduct or contract with other entities to conduct, an ongoing joint education, outreach, and public involvement program based on stormwater issues significant within ITD's jurisdiction.

3.1.2 Conduct a Public Education, Outreach, and Involvement Program

To educate and involve 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 one year of the Permit effective date, ITD must, at a minimum:

Coordinate educational efforts targeting at least one of the four audiences listed in Part 3.1.4.

Include public involvement that informs and engages interested stakeholders in the development of the SWMP.

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 Interagency Government Agreement specifies that City of Boise will be the lead on the control measure. The ITD participates in the development of public educational materials and provides input on who the target audience should be and what message should go out to them. \

3.1.7.1 Outreach/Training on Construction Site Control Measures

At least once per year provide training to local audiences on the requirements for construction operators as described in Part 3.3.

This training was provided through the City of Boise.

3.1.7.2 Outreach/Training on Permanent Stormwater Controls

At least once per year provide training to local audiences on the requirements for permanent stormwater management controls as described in Part 3.4.

This training was provided through the City of Boise.

3.1.8 Maintain a publicly Accessible Website that is update at least annually

A publicly accessible website must include:

- Contact information for illegal dumping.
- Reports, plans, strategies, or documents.
- Information regarding policies and/or guidance.
- General contact information.

ITD maintains a publicly accessible website. 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's website is located at <https://itd.idaho.gov/env/?target=stormwater>

Intended Compliance Schedule for Part 3.1

Implementation of required components described in Parts 3.1.2 through 3.1.8 is due April 3, 2026.

3.2 Illicit Discharge Detection and Elimination

ITD must implement and enforce a program to detect and eliminate illicit discharges into the MS4. To be compliant the program must contain all the components in Parts 3.2.2 through 3.2.9.

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.

3.2.2 MS4 Map and Outfall Inventory

Update and maintain an MS4 facilities map that shows outfalls, interconnections, location, physical condition, and framework to track inspections, dry weather discharge screenings, and maintenance. Explain the program in the SWMP.

Mapping is being verified and outfalls confirmed. ITD's 3 outfalls are located at Barrister Road into the Ridenbaugh Canal (1 outfall) and at Americana Blvd. into the Boise River (2 outfalls). The Maps of the ITD MS4 Storm Water Infrastructure can be seen at the following address:

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

3.2.3 Ordinance and/or Other Regulatory Mechanism

ITD must prohibit non-stormwater discharges in the MS4 through enforcement of a regulatory mechanism. ITD must implement appropriate enforcement procedures and actions, including a written policy of enforcement escalation procedures for recalcitrant or repeat offenders.

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.

3.2.4 Illicit Discharge Complaint Report and Response Program

ITD must develop an Illicit Discharge Complaint and Response Program that implements responses to public reports of illicit discharges within 2 working days. Education and training on where to find the reporting paperwork must be provided. Complaint tracking must be done to show what actions were taken by ITD and included in the Annual Report.

An update Complaint Response Manual is found in the City of Boise's Annual Report. The updates include the enforcement agreement, contacts, and calling matrix. ITD does not have authority to enforce in civil matters; therefore, ITD has an enforcement agreement with the City of Boise and Garden City in cases where cases must be escalated. A copy of the Enforcement Agreements is attached in Appendix F of the ITD 2022 Annual Report. ITD did not receive any complaints this reporting year.

3.2.5 Dry Weather Outfall Screening Program

Dry weather outfall analytical and field screening monitoring helps identify and detect non-stormwater flows from MS4 outfalls during dry weather. ITD must prioritize and target outfalls for screening. Develop a written plan to identify how microbiological field screening analysis will be conducted, including field screening methodologies and trigger thresholds. ITD must conduct visual dry weather screening documenting those outfalls that do or do not have flows. ITD must maintain records and include results in the Annual Report. ITD screens one outfall per year. Where flows are present, grab samples are taken, and analysis is done for pH; total chlorine; detergents as surfactants; total phenols; E. coli; total phosphorus; turbidity; temperature; and suspended solids concentrations.

ITD maintains 3 outfalls in the Permit Area. A grab sample was taken from the one outfall that has a discharge on Americana Blvd. ITD shares these outfalls with ACHD. Please see the documentation in the 2022 ACHD Annual Report.

3.2.6 Follow -up

Within 30 days ITD must investigate recurring illicit discharges to determine its source. Within 60 days ITD must eliminate the source or determine if the source is irrigation return water or groundwater seepage and document such.

ITD must maintain spill response records and coordinate their efforts with appropriate departments, agencies, and programs. Respond to, maintain, and clean up any sewage spill or other material that may discharge into the MS4. ITD must report with 24 hours, all spills which may impact ground or surface waters to the IDEQ.

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.

Spills are reported to the fire department and the ITD Hazardous Materials Coordinator. The Fire Department handles site cleanup. If the owners of the spill do not pay, ITD can clean the spill and charge them.

3.2.8 Proper Disposal of Used Oil and Toxic Materials

Educate public and ITD employees about proper management, disposal, or recycling of used oil, vehicle fluids, toxic materials, and other household hazardous wastes.

ITD encourages the City of Boise to bring their Household Hazardous Waste Mobile Collection truck to

our head quarters offices. We provide a link to the City of Boise’s hazardous collection webpage on our MS4 website which provides the pick-up days and educates about household hazardous materials.

3.2.9 Illicit Discharge Detection and Elimination Training for Staff

ITD must train appropriate employees on how to conduct dry weather screening activities and to respond to reports of illicit discharges and spills in the our MS4 within the first six months of employment. Comply by taking an in-person or online training every other year.

The Illicit discharge detection and elimination training program training ITD has been using is a video purchased by the co-permittees. ITD is in the final stages of development of an ITD specific training.

Intended Compliance Schedule for Part 3.2

Update Illicit Discharge Management Program by April 3, 2026.

3.3 Construction Site Runoff Control

ITD must implement a construction site runoff control program to reduce discharges of pollutants from the public which contain components in Parts 3.3.2 through 3.3.7 of the Permit.

3.3.2 Ordinance and Regulatory Mechanism

ITD must require erosion controls, sediment controls, and waste materials management controls to be used and maintained at construction sites from initial ground disturbance to final stabilization.

ITD follows the conditions of the NPDES CGP, including follow up, tracking, and reporting.

3.3.2.1 Compliance with Other NPDES Permit Requirements

ITD must require construction site operators to maintain effective controls to reduce pollutants in stormwater discharges to the MS4. ITD must inspect and enforce site operators to ensure compliance.

ITD requires construction site operators to control erosion and waste at construction sites disturbing 1 acre or more with a SWPPP, and for areas with less a Pollution Prevention Plan is required (PPP). ITD has establish installation and use guidelines for erosion, sediment, and waste management during all phases of construction activity. 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.

3.3.3 Construction Site Runoff Control Specifications

ITD must require site operators to use BMPs out of approved manuals and maintain specifications that address proper installation and maintenance.

ITD contracts require the use of the ITD Best Management Catalog. Approvals from the Engineer must be given for use of BMP’s not in the catalog. Installation and maintenance of the BMP’s is specified.

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>

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. PPP's are required on projects that do not exceed 1 acre. Both ITD and the contractor are required to apply for CGP coverage.

3.3.4 Preconstruction Site Plan Review

ITD must establish an inspection prioritization and describe it in the SWMP. In each Annual Report, ITD must summarize the nature and number of inspections, follow-up, and document enforcement actions. Inspections must include a the NOI, review of the PPP, SWPPP to determine if the intended BMP's are being implement correctly, an assessment of the effectiveness of the BMP's, compliance, and observations of existing or potential discharges or illicit connections from the site. Additionally, provide the site operator with stormwater pollution prevention education as needed, and a written or electronic inspection form.

ITD conducts pre-construction site plan reviews for all projects using by providing the Engineer with their comments, usually in form of a email, but may be in writing. ITD maintains polices and specifications that require all projects to have sediment and erosion control protocols in place from initial ground disturbance to final stabilization. Any ITD project must either have a PPP or 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 and have the required approvals (i.e.: NOI).

Within the MS4 area ITD had 1 project that required a PPP review.

3.3.5 Construction Site Inspection and Enforcement

ITD must inspect construction sites based on a prioritization system and document the prioritization system in the SWPPP. Summarize the nature of inspections, follow up actions, and enforcement actions. Compliance with Parts 3.3.5.1 through 3.3.5.7 are required at all inspections.

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. Repeat violations are handled with a variety of options which include: Avoid Verbal Orders, inspection recommendations, written warnings, Stop Work Orders, monetary penalties (dependent on the contract), and breach of contract. Inspection prioritization is set based on project sensitivity to pollution potentially discharged to waters of the US., sensitivity of the waters being discharge to, previous inspections, and previous violations.

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.

One project was completed in the MS4 area which required 10 inspections. Inspections were completed and no follow up or corrective actions were needed.

3.3.6 Enforcement Response Policy for Construction Site Runoff Control

Maintain and implement a written escalating enforcement response plan that describes ITD's response to violations through education and/or enforcement. Describe how the plan will deal with repeat violations, and any other techniques to ensure compliance (ie: warnings, stop work orders, monetary).

This is handled through contracts.

3.3.7 Construction Runoff Control Training for Staff

ITD must ensure that all persons responsible for preconstruction site plan review, site inspections, and enforcement are trained and qualified to conduct the activities. Train new employees prior to 6 months after hire and existing employees every other year. Training may be in person or online.

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 must summarize in each Annual Report the nature of the site, number of inspections, follow-up actions, and any subsequent enforcement actions in the reporting period.

Intended Compliance Schedule

April 3, 2026

3.4 Post Construction Stormwater Management for New Development and Redevelopment

ITD must implement and enforce a program to control stormwater runoff from new development and redevelopment projects that result in land disturbance of 5,000 square feet or more. 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.

ITD must include all components of this control measure in Parts 3.4.2 through 3.4.7 to be compliant.

3.4.2 Ordinance and Regulatory Mechanism

Require installation and long-term control maintenance of permanent stormwater controls at new development and redevelopment project sites by state law and consistent with the state's legal authority.

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. Retain the first 0.6 inches of rainfall from a 24-hour event preceded by 48 hours of no measurable precipitation.

3.4.2.1 Treatment equivalent to the onsite stormwater design standard

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.

ITD designs their stormwater facilities for a 100 year storm event. Storm water designs standards are found in the ITD Roadside Design Manual Section 320 and typically follow the American Association of State Highway and Transportation Officials -Green Book. Where local jurisdictions have equal to higher standards those standards are typically used, but the design standards are determined project by project.

3.4.2.2 Alternatives for Local Compliance

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.

3.4.2.3 Green Infrastructure Strategy Implementation

Continue the implementation of Green Infrastructure Strategies and report progress as part of Permit Renewal Application.

ITD has been directing our stormwater from I-84 into swales and retention ponds. We have disconnected the outfalls where reasonable.

3.4.2.4 Repair of Public Streets, Roads and Parking Lots

When public roads or parking lots are repaired ITD must evaluate the feasibility of

incorporating runoff reduction techniques.

Where possible ITD has disconnected from the MS4 on the Interstate, sending stormwater to retention ponds and seepage beds. Implementation of permeable pavement has not been allowed on state roads and interstates because our climate combined with maintenance practices reduces the pavement useful life.

3.4.2.5 Plan Review and Approval

ITD must have procedures for review and approval of permanent stormwater control plans for development and redevelopment.

ITD requires the review and approval of all PPP and SWPP Plans. The Environmental Planners and Engineers review the PPP's and SWPPP's for permit compliance. Any comments are addressed prior to approval and certification of the SWPPP. Comments are saved in the project files.

3.4.3 Permanent Stormwater Controls Specification

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. The specifications must include:

- Specifications for site-based practices suitable to local soils and hydrologic conditions
- Acceptable control practices- sizing criteria, performance criteria
- Specifications for proper long-term operations and maintenance-appropriate inspection interval and self-inspections checklists for responsible parties.

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>.

3.4.4 Permanent Stormwater Controls Plan Review and Approval

ITD must review and approve construction plans for permanent stormwater controls at new development and redevelopment sites for projects that have 5,000 square feet or more of ground disturbance by someone with a technical understanding of stormwater controls.

ITD requires a review of PPP (Erosion and Sediment Control Plans) and SWPPP's (Part of the CGP) for all projects. The reviews are done by the engineering staff and environmental staff. Comments are made via Word or email and returned to the contractor for revisions. When the PPP or SWPPP's are returned they are back checked for correct responses and approved. Comments and responses are kept in the project files.

3.4.5 Permanent Stormwater Controls Inspection and Enforcement

ITD must ensure proper long-term maintenance of all such facilities. ITD must implement an inspection program which defines and prioritizes inspections to ensure proper installations and long-term operation and maintenance.

3.4.5.1 Inspect High Priority Locations

3.4.5.2 Enforce Requirements

ITD's permanent stormwater controls are maintained by maintenance staff to make sure they operate as intended. An inspection prioritization program has not been developed. Permanent stormwater controls are mostly owned and operated by ITD staff.

3.4.6 Operation and Maintenance of Permanent Stormwater Controls

3.4.6.1 Operation Agreements

3.4.6.2 Operation and Maintenance Inspections of High Priority Locations

Where permanent stormwater controls are operated by others, agreements require them to maintain and operated the controls per requirements. Currently ITD does not have permanent stormwater controls under agreement.

3.4.7 Permanent Stormwater Controls Training for Staff

ITD must ensure that persons responsible for reviewing and inspection the installation and operation of permanent stormwater controls. Training may be in person or online.

Permanent stormwater controls are inspected by engineers and their assigns during installation and after the project is completed. Maintenance staff take over inspections post construction.

Intended Compliance Schedule

April 3, 2026

3.5 Stormwater Infrastructure and Street Management

ITD maintains a 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 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 and HQ Bridge Section. ITD invites participation by local jurisdictions in design reviews for projects developed within the MS4 area.

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.

ITD properly operates and maintain the MS4, and its facilities using prudent pollution prevention and good housekeeping.

3.5.2 Inspect and Clean Catch Basins and Inlets.

Inspect catch basins and inlets at least once every two years. The prioritization of inspections are based on functionality, potential impacts to receiving waters, and public safety. Material removed from the MS4 catch basins and inlets must be managed according to Part 7.13. Records of inspections and removed materials must be maintained and reported in the annual report.

3.5.3 Operation and maintenance Procedures for Streets, Roads, Highways and Parking Lots

Highways must be maintained to protect water quality and reduce discharge for impervious surfaces greater than 3,000 square feet.

3.5.3.1 Procedures must include practices to reduce road and parking lot debris /pollutants from entering the MS4 (IE: deicing, snow removal, sand, salt).

ITD's parking lots are at the maintenance yards and its state offices on Chinden Blvd (Old HP Campus). Parking lots are swept at least once per year.

3.5.3.2 For each type of maintenance activity, specify schedules for inspections and maintenance.

ITD maintains maintenance agreements with ACHD which specifies who is responsible for each element of the roadway.

3.5.3.3 Where site conditions allow, ITD must consider water conservation measures for landscaped areas.

3.5.4 Inventory and Management of Street/Road Maintenance Materials

ITD must reduce pollutants in discharges from street and road maintenance material stockpiles.

Maintain an inventory of road maintenance materials stored and assess the adequacy of materials storage location to prevent adverse water quality impacts. Use structural or non-structural improvements to eliminate such impacts. Include the materials location in the SWPPP and provide a description of the site (discharge to waters of the US, amount stored annually, how the material is being used, and what controls are in place).

ITD tracks the amount of salt storage. The salt stockpiles are covered with a covered structure and there is an impervious bottom. There is no discharge to Waters of the US. Also see 3.5.8 below.

3.5.5 Street, Road, Highway and Parking Lot Sweeping

Maintain and update as needed the sweeping management plans. Designate roadways under residential, arterial, or parking lots.

3.5.5.1 Maintain an inventory and sweep according to the following schedule:

Roadway Type	Sweeping Schedule			
	Two Times per Month	Every Six Weeks	Four Times Per Year	One Time Per Year
Downtown Areas of Boise and Garden City	X			
Arterial and Collector Roadways (non-downtown)		X		
Residential Roadways			X	
Paved Alleys and Public Parking Lots				X

All state roads are maintained by the local jurisdictions except for I-184 (Connector) and the Interstate. ITD sweeps the connector and the Interstate at least once every 6 weeks. Where there is curb and gutter with no access control, the local jurisdiction takes care of most roadway maintenance activities that do not require construction. Maintenance agreements provide the frequency of sweeping.

3.5.5.2 If current sweeping plan exceeds what is in the table above ITD must keep continue with that schedule.

3.5.5.3 Where sweeping is infeasible the management plan must describe why and discuss alternatives.

There are no areas that are infeasible to sweep.

3.5.5.4 Management Plan must discuss sweeping activities, types of sweepers, number of lane miles, general schedule or dates of sweeping, volume or weight of materials removed, and ITD's estimate of the effectiveness of their sweeping.

ITD has 130.8 lane miles of sweeping. Sweepers equipped with water are used. Sweeping frequency is at least every two weeks, but not more than 6 weeks. An estimated volume of material that was swept is 672 cubic yards of material from the permit area. Note: Calculation: Total Area Swept (33 miles) divided by length of permit area (8 miles) and then dividing the full yardage swept (2688 cubic yards) by the percent of permit area swept (25 percent). Only a fraction of this material has the potential of getting to the municipal storm drain system because most of our inlets/catch basins do not have a connection to the Waters of the US. Thirty-seven catch basins/inlets were inspected and cleaned during the reporting period. Not all 37 connect to a Waters of the US. ITD has been disconnecting their municipal storm system, where possible, for several years. There are 3 known catch basins/inlets in the permit area which drain to a water body.

3.5.6 Operation and Maintenance procedures for Other Municipal Areas and Activities

Review procedures for inspection and maintenance schedules to ensure pollution prevention and good housekeeping practices are conducted for the following activities:

Grounds/park and open space maintenance

Fleet maintenance and vehicle washing operations

Building maintenance
 Snow management and snow disposal sites
 Solid waste transfer activities
 Materials storage
 Heavy equipment storage areas
 Hazardous materials storage
 Used oil recycling,
 Spill control and prevention measures for municipal refueling facilities.

The ITD facilities have been reviewed for pollution prevention and good housekeeping practices. All ITD's facilities are maintaining good housekeeping practices for reduction of pollutants to the MS4.

3.5.7 Requirements for Pesticide, Herbicide, and Fertilizer Applications

Reduce discharge of pesticides, herbicides, and fertilizers. All employees must follow applicators license requirements.

All ITD employees and contractors responsible for pesticides, herbicides, and fertilizers are required to follow the requirements of their applicators license when working around all water.

3.5.8 Stormwater Pollution Prevention Plans for Permittee Facilities

Implement a site-specific SWPPP for ITD maintenance yards within the MS4.

A site specific SWPPP is being developed for ITD's 2 Maintenance Yards (Orchard and Garden City) within the City of Boise. Implementation is planned for 2024.

There are two road maintenance material storage yards in the permit area. One is located at 8150 Chinden Blvd, Boise Idaho (Known as District 3 Office/Yard) contains offices for staff, fleet maintenance facilities, supply building, sign shop, electrician shop, carpenter shop, vegetation crew shop, striping shop, and areas for parking and material storage.

The other one is at 5400 W. Diamond Street, Boise Idaho (Known as the Orchard Yard). This location has a maintenance shop, sand/salt storage area, and a depleted source pit.

Magnesium Chloride and salt are used for traction and deicing materials. ITD's District 3 Yard stores an average of 1,185 tons of salt and 11,454 gallons of Magnesium Chloride. The Orchard Yard stores an average of 631 tons of salt and 27,000 gallons of Magnesium Chloride. The materials are spread on the interstate and state highways within the permit area.

3.5.9 Litter control

Implement methods to reduce litter in ITD's jurisdiction.

ITD operates an Adopt-a-Highway Program which organizes volunteer groups to 'adopt' sections of the state highways and interstates. The volunteers are required to pick up litter at least once a year but may do more. Hundreds of pounds of floatables, metals, and rubber are kept from going into storm drains. This water year ITD collected 135,205 pounds of garbage.

3.5.10 Stormwater Pollution Prevention/Good Housekeeping Training for Staff

Ensure those involved in management, operations, and maintenance of stormwater infrastructure are properly trained. New staff trained prior to 6 months and existing staff trained every other year (in-person or online).

Appropriate staff have been trained.

Intended Compliance Schedule

April 3, 2023 Maintenance Facility SWPP

3.6 Industrial and Commercial Stormwater Discharge Management

Throughout the permit term ITD must implement a program to educate commercial operators how reduce pollutants that are considered contributors of phosphorus, bacteria, temperature, and sediment. At a minimum the program must include Parts 3.6.1 through 3.6.3.

3.6.2 Inventory of Industrial and Commercial Facilities.

Maintain an inventory of industrial and commercial facilities within their jurisdiction. Provide a description of the inventory and summary of the compliance assistance, inspections, and follow-up actions in the SWMP.

ITD has not developed an inventory of industrial and commercial facilities mapping.

3.6.2.1 List the water body, assessment unit, facility name, address, nature of business, and Industrial Classification.

If a discharge was discovered from an adjacent commercial or industrial facility the water body, assessment unit, facility name, address, nature of the business, and classification would be recorded.

3.6.2.2 List must include municipal landfills, maintenance yards, hazardous material recovery, treatment storage and disposal facilities, equipment wash systems, urban agricultural activities, and other activities that ITD determines is contributing to substantial pollutant loading of the MS4.

No mapping is being done.

3.6.3 Inspection of Industrial and Commercial Facilities

Throughout the Permit term, prioritize and inspect selected industrial and commercial facilities which discharge to Waters of the US. At a minimum the inspection program must include:

3.6.3.1 Priorities and procedures for inspections, including training, and compliance education materials.

ITD does not have authority to inspect or do compliance inspections. If pollutant discharges are noticed they are reported and followed up on within the ITD right-of-way. Beyond that the local jurisdictions must assist.

3.6.3.2 Recorded observations and findings from the inspected facilities and any follow-up.

Inspections are not done by ITD.

3.6.3.3 A monitoring program that assesses type and quantity of pollutants going to the MS4.

If pollutants are discovered inside the ITD right-of-way, a sample would be taken and tested to characterize the material. An estimate of the pollutant being discharged to the MS4 would be made and recorded. If needed the local jurisdiction would be contacted for follow-up inspections and enforcement.

3.6.3.4 Legal authorities.

ITD does not have legal authority to control land use so we have a cooperative agreement with the City of Boise and Garden City who do the inspections. If there is illegal dumping or illicit discharge which enters ITD property ITD can address the issue under Idaho Statute Title 18 Chapter 39 prohibits dumping, littering, and placement of debris or any waste on highways.

Intended Compliance Schedule

April 3, 2026