

**From:** [Mary Anne Nelson](#)  
**To:** [Paula Wilson](#)  
**Subject:** FW: City of Boise IPDES comments  
**Date:** Monday, May 8, 2023 7:49:57 AM  
**Attachments:** [image002.png](#)

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The only set of comments received.



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**From:** Kate Harris <kharris@cityofboise.org>  
**Sent:** Friday, May 5, 2023 5:07 PM  
**To:** Mary Anne Nelson <mary.anne.nelson@deq.idaho.gov>  
**Subject:** City of Boise IPDES comments

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Ms. Nelson,

The City of Boise appreciates the opportunity to provide written comments on the proposed updates to the IPDES rules.

**110.**

The City of Boise appreciates the adjustments to the IPDES Billing section, specifically the adjustment of the payment date from October 1 to December 31. It is unknown to the city if other municipalities utilize the monthly payment plan option. The city recommends that DEQ, if they haven't already, evaluate the utilization and ongoing benefit of this option.

**370.003.03.g**

The city recommends that text be added to the last sentence in this section to capture Pretreatment Local Limits. Recommended text: This term includes prohibitive discharge limits established under 40 CFR 403.5 or following procedures outlined in 40 CFR 403.8.

**370.010.66**

Text in this section says "see Industrial Wastewater" but the definition was removed from the definitions section. The city recommends to either remove or clarify language such as "also referred to as Industrial Wastewater"

**370.01**

This appears to be an incomplete sentence. The contents here also appear to be redundant with section 003.02.y. Recommend editorial review of this section.

## Integrated Planning

The city encourages DEQ to incorporate Integrated Planning into the IPDES rules. There are likely additional additions necessary to the recommendations below, but some to begin:

Page 7 – insert definition for Integrated Planning:

A voluntary plan developed by the permittee in consultation and coordination with the Department. The plan will be based on USEPA 2012 policy guidance as further codified by the federal Water Infrastructure Act. Integrated Plans may include wastewater discharges from POTWs, reclaimed or recycled water from municipalities, MS4 stormwater, nonpoint source municipal stormwater, and municipal owned geothermal water. An Integrated Plan may also incorporate other watershed activities undertaken by municipalities such as beneficial reuse of biosolids, stream and restoration activities, aquatic and riparian improvements.

Page 20 – Insert a new subsection in 05 authorizing a voluntary applicant-developed and Department approved Integrated Plan.

Page 30 – Insert a subsection under (9) an Integrated Plan if the applicant has voluntarily developed one in consultation with the Department.

Page 52 – 4(iv). An Integrated Plan may serve or be a component of this management program if the applicant includes stormwater in the Integrated Plan.

The City of Boise appreciates the opportunity to submit comments. We look forward to working with our state and local partners in the development of these important rules. If there are any problems with the comments, please don't hesitate to reach out.

Thank you,  
Kate Harris



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