

INDIAN TRAIL IMPROVEMENT DISTRICT
MS4 Permit No. FLS000018-004
Part V. – Monitoring Requirements; Sub-part A.
Assessment Program

Assessment Program Objective

The purpose of this assessment program is to provide information for Indian Trail Improvement District (ITID) to determine the overall effectiveness of its Stormwater Management Program (SWMP) in reducing stormwater pollutant loadings from its Municipal Separate Storm Sewer System (MS4) to receiving water bodies.

Assessment Program Components

As required by the MS4 Permit, the following parts make up this Assessment Program:

- A. **A Water Quality Monitoring Plan** – ITID is relying on the group data, however ITID does collect supplemental data as discussed below. ITID will use these data from the group to evaluate trends and generate its own MS4 assessment.
- B. **A Pollutant Loading Estimate Plan** – Indian Trail Improvement District MS4 is almost all low density (1¼ acre or larger) residential lots. Its pollutant impact to the NPDES receiving water is minimal. ITID has 2 defined drainage basins: the M-1 and M-2 Basins. The M-2 Basin has 10 NPDES outfalls into Seminole Improvement District's M-2 Canal that subsequently discharges into SFWMD's C-51 Canal. All of the M-2 Basin is low density single family residential. The M-1 Basin has 7 MS4 outfalls which discharge into either the SFWMD's L-8 Basin or their C-51 Basin. ITID has consistently demonstrated high water quality. As part of ITID's ERP permit for the M-1 Basin from SFWMD, ITID is required to take water quality samples. These samples are taken at 3 locations, see attached. Phosphorous has been identified as the limiting nutrient in South Florida and ITID's results for total phosphorous are typically between 30 and 60 ppb. Although these data are taken and demonstrate good water quality, ITID is relying on the Group Report while having these data as local ITID information to respond to any water quality questions.
- C. **An Evaluation and Response Plan** – The response plan is the plan of action to be taken based on the results from A. and B. and will be used to:
 - 1. evaluate trends in pollutants loading from the MS4 — see Group Report.
 - 2. evaluate trends in water quality (of discharge from the MS4) — see Group Report.
 - 3. identify portions of the MS4 to be targeted for loading reduction/corrective action — neither the Group Report or the ITID water quality data indicate any areas need to be targeted for loading reduction.

Part A – Water Quality Monitoring Plan

ITID will rely on the Group Report with backup provided by its water quality data to answer any questions relative to ITID.

Monitoring Locations

ITID will rely on the Group Report, but has included a map of its supplemental ITID sampling locations. The two applicable group monitoring locations are 38B and 37B. The vast majority of ITID's discharges are from the M-1 Basin into the C-51 Canal. However, at times of very high rainfall discharges can occur to the L-8 Canal. The C-51 Canal can flow either east or west according to the SFWMD operations. The COE DDM specifies a westward flow, but this is dependent upon completion of STA 1-E to meet the Everglades water quality standards. In other words: the upstream station could be either 38B or 37B according to operations by others. The evaluation is therefore conditioned on knowing the C-51 flow direction which can be determined by stage data and pump operations of the SFWMD S-319 Pump Station. Also note that all of the discharge from the M-2 Basin is into the C-51 Canal.

Sampling Method

Not Applicable.

Monitoring Parameters

See Group Report. ITID collects supplemental data in the M-1 Basin that can, but is not planned to be utilized.

Part B – Pollutant Loading Estimate Plan

ITID will rely on the Group Report. The Group will be developing pollutant loading estimates during the 3rd year of this permit cycle, using the SIMPLE protocol. In order to provide each permittee with pollutant loading estimates that reflect their respective MS4 areas, the group effort will provide the loading estimates "by MS4," in addition to "by watershed" (as was done in past permit cycles). Prior to Year 3, ITID has participated in this effort by updating its MS4 contributing areas to the receiving water, and will provide updated information on the area extents and the land uses located therein if needed. In addition, any water quality best management practices (BMPs) will be updated as applicable.

Pollutant load reductions will be estimated based on the BMPs that have been put in place within the MS4 contributing areas. In this way, when future estimates are done, and potentially additional reduction measures or BMPs are put in place, the estimated pollutant loading will reflect the reductions.

The EMC values to be used in the Cycle 4 pollutant loading estimates will be the same as those used in Cycle 3. This will provide consistency in comparing data. Trends in these data will be tracked per permit cycle. Cycle 3 is the base and trends can be established thereafter in pollutant loadings based on the new Group loading estimates "by MS4". New pollutant load estimates by MS4 will be tracked starting with Cycle 4 (Cycle 3 is the base so trends can't be established with one point).

ITID will use these data from the group to evaluate trends and generate its own MS4 assessment.

Part C – Evaluation and Response Plan

ITID will rely on the data from the Group sites 38B and 37B. Based on these data, ITID will generate its own MS4 assessment to determine the effectiveness of the District's program and whether there is a need to implement additional pollutant reduction measures. Note; results from these data are included in the Group's Annual Report already by year. In the past some Annual Reports also presented the data and trends from west to east (the typical current direction of discharge). These water quality data trends should be sufficient to track trends. However, if sites 38B and 37B are not sufficient, ITID will review the

data it collects for the M-1 Basin for incorporation into the analyses, but again, this is not anticipated to be needed.