Total Phosphorus TMDL
Overview of Strategy

In accordance to Idaho Code 39-3611

• (8) Each TMDL and any supporting SBA shall be developed and periodically reviewed and modified in consultation with the WAG for the watershed in which the water bodies located.

• (6) No instream target for a pollutant shall be set as part of a TMDL process unless the data and analysis in the subbasin assessment demonstrate that the pollutant is causing or contributing to a violation of a water quality standard in the stream for which the TMDL is being developed.

• (6 cont’d) If a pollutant load is allocated to a tributary inflow as part of a downstream TMDL, the director shall develop a plan to meet such allocation in consultation with the tributary watershed advisory group as provided in subsection (8) of this section.
Idaho Water Quality Standards-
Nutrients

“Surface waters of the state shall be free from excess nutrients that can cause visible slime growths or other nuisance aquatic growths impairing designated beneficial uses”

• (IDAPA 58.01.02.200.06)
TP Targets and the TMDL

Two water quality objectives regarding compliance with Law and our narrative Water Quality Standard:

(1) Meet the TP load allocation set for the Boise River in the SR-HC TMDL and allocations distributed within the LBR, and

(2) Develop the target necessary to meet our narrative standard for the Boise River.
TP Targets and the TMDL

If the narrative standard we establish for LBR impairment is less than the .07 that will:

• then the allocations for the Boise River TMDL will drive permitting and other regulatory actions for sources on the River

If we determine that our narrative standard for the Boise River can be met with levels above .07

• then the SR-HC allocation will continue to drive the permitting and other regulatory actions. In other words, whichever is more stringent will drive the process, but
TP Targets and the TMDL

The SR-HC TMDL, tributary specific data can be used to change the tributary allocation:

(1) page 443: “For the determination of allocable load for the five tributary streams to the Snake River, tributary specific data will be collected and reviewed as part of the implementation plan process. These data will allow for accurate, tributary-specific estimates of naturally occurring total phosphorus concentrations so that anthropogenic loads can be identified and allocated to point and nonpoint sources within the tributary systems....These allocations will be identified on a tributary be tributary basis using tributary TMDL processes with the goal of establishing accurate site-specific targets for each anthropogenic source.”
TP Targets and the TMDL

The SR-HC TMDL, tributary specific data can be used to change the tributary allocation:

1) page 447, the TMDL states: ”Future data collection and analyses may determine that, due to natural conditions or other factors, the target concentrations for the mouths of the tributaries cannot be practicably achieved. This, in most cases, will occur when TMDLs are conducted on the tributaries. If subsequent tributary TMDLs indicate that the target concentration is not achievable, the Snake River/Hells Canyon TMDLs for total phosphorus will be reopened and appropriately revised. “
Clear as Mud
Total Phosphorus TMDL