



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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C. L. "Butch" Otter, Governor
Curt Fransen, Director

Date: June 13, 2013
From: Lance Holloway, Boise Regional Office Surface Water Manager
To: Lower Boise Watershed Council
RE: DEQ Use of the USGS Mass Balance Model

Background and Problem Identification

As DEQ personnel have discussed at Lower Boise Watershed Council (LBWC) and Technical Advisory Committee (TAC) meetings, it was DEQ's understanding and intent to receive a courtesy copy of the peer-reviewed, but not-yet-finalized, USGS mass balance model in order to begin analyzing and developing potential load and waste load allocation scenarios for the LBR TP TMDL. However, it has since been clarified that USGS protocols prohibit un-finalized courtesy copies from being shared beyond their immediate clients (in this case, DEQ). As a result, DEQ cannot receive this model courtesy copy without potentially compromising the USGS peer review and publication process, which is something neither USGS nor DEQ can allow. Without the ability for DEQ to start working with this model now, DEQ's timeline to complete the TMDL will be severely compromised.

DEQ's Planned Approach

Because the LBR TP TMDL is a high priority for DEQ, the LBWC, and others, and in order to make timely progress in the analyses and development of potential load and waste load allocation scenarios, it is DEQ's intent to have DEQ staff work at USGS with their staff oversight, model and resources, to start modeling potential load and waste load allocation scenarios. This will allow DEQ to work on the mass balance model and continue making timely progress on the TP TMDL, while not compromising the "courtesy copy" aspect of the mass balance model and the associated USGS publication process.

The unfortunate result under this scenario, however, is that only DEQ would have access to the model until it is finalized by USGS in December of 2013. Even so, DEQ fully intends to regularly consult and coordinate with the LBWC, TAC, and other interested stakeholders throughout the analyses and development of potential load and waste load allocation scenarios in order to be as transparent as possible until the model has been published by USGS and is available for public use. Once the model is publically released, DEQ plans to ensure the WAG is provided the time it deems necessary to evaluate the model, load, and waste load allocations. Our plan is to provide the LBWC information between now and the model's release that will allow you to complete a timely review. The alternative is for DEQ to start working with the model in December 2013, which would severely compromise DEQ's TMDL completion schedule.