2008 Integrated Report (303(d)/305(b))

Response to Comments Matrix

DEQ conducted a 30-day public comment period / call for data on the Policies and Procedures document and water body specific actions taken in Idaho's 2008 Integrated Report. 25-comment letters were received and DEQ most appreciates those that were provided online via DEQ's web based mapping project. The following 106 page table forms DEQ's response to comments regarding actions taken on the Draft 2002 Integrated Report and incorporated in the final 2008 Integrated Report.

2008 INTEGRATED REPORT COMMENTERS LIST

No.	NAME(S)	ADDRESS/AFFILIATION	SUBMITTAL DATE
1	Dan Dinning, Gary Aitken Sr., David Anderson	*Kootenai Valley Resource Initiative*	January 29, 2008
2	Gil Hagen	*Boundary Soil Conservation District* P.O. Box 23Bonners Ferry, ID 83805	January 29, 2008
3	Tracy Chellis	*EPA Region 10 Watersheds Unit* 1200 Sixth Ave., Suite 900, OWW-134 Seattle, WA 98101 Chellis.Tracy@epamail.epa.gov	February 07, 2008
4	Betsy Rieffenberger	*Salmon-Challis National Forest* brieffenberger@fs.fed.us	February 07, 2008
5	Leigh Bailey	*Payette National Forest* lbailey@fs.fed.us	February 07, 2008
6	Jamie Davis	*IASCD/ISCC* jldavis@agri.idaho.gov	February 14, 2008
7	Michael J. Fuss	*City of Nampa Public Works Department* 411 Third St. So., Nampa, ID 83651 fussm@cityofnampa.us	February 19, 2008
8	Steven C. Smith	*Kinross DeLamar Mining Co.* P.O. Box 52 Jordan Valley, OR 97910	February 19, 2008
9	Tom Dupuis	*Lower Boise Watershed Council* 322 East Front St., Suite 200, Boise, ID 83702	February 19, 2008
10	Richard Rogers	1066 Saratoga Dr. Boise, ID 83706	February 19, 2008
11	Lawrence A. Timchak	*Caribou-Targhee National Forest* 1405 Hollipark Dr., Idaho Falls, ID 83401	February 19, 2008

12	Kevin Lewis	*Idaho Rivers United* kevin@idahorivers.org	February 19, 2008
13	Ranotta K. McNair	*Idaho Panhandle National Forests* 3815 Schreiber Way Coeur d'Alene,ID 83815	February 20, 2008
14	Robin Finch	*City of Boise* rfinch@cityofboise.org	February 20, 2008
15	Brian Hoelscher	*Idaho Power Company* bhoelscher@idahopower.com	February 20, 2008
16	Mike Mihelich	*Kootenai Environmental Alliance* P.O. Box 1598 Coeur d'Alene, ID 83816	February 20, 2008
17	Dan Dinning	*Boundary County, Idaho* commissioners@boundarycountyid.org	February 20, 2008
18	Patty Perry	*Kootenai Tribe of Idaho* patty@kootenai.org	February 20
19	Larry Zuckerman	*Western Watersheds Project* larry@westernwatersheds.org	February 20
20	Nick Gerhardt	*Nez Perce National Forest* ngerhardt@fs.fed.us	February 20
21	Scott Fields	*Coeur d'Alene Tribe Water Resource Program*	February 20
22	David Croxton	*EPA Region 10 Watersheds Unit* 1200 Sixth Ave., Suite 900, OWW-134 Seattle, WA 98101 Croxton.David@epamail.epa.gov	February 20
23	Robert Steed	*DEQ Coeur d'Alene Regional Office* 2110 Ironwood Pkwy, Coeur d'Alene, ID 83814 robert.steed@deq.idaho.gov	January 16, 2008
24	Dave Wattenbarger	Ag/Landowner Main St., Bonners Ferry ID 83805 djw@cdink.net	February 19, 2008
25	Justin Hayes	ICL	February 20, 2008

Comment #	Waterbody	Commenter	Comment	Response
1.	ID17010104PN004_02	1	*The WAG has strong concern for the inappropriate proposed designation of Blue Joe Creek as a part of Section 5, Impaired Waters. We respectfully request that it be removed from Section 5 and listed in Section 4(b).*	DEQ's effort to document a Section 4(b) justification for the metals impairing Blue Joe Creek fell short as additional documentation from the CERCLA removal action on Blue Joe Creek was disclosed by EPA. Here is an excerpt from the 2004 Removal Action report: "…surface water and groundwater treatment was not addressed as part of the Removal Action. It is anticipated that beneficial effects from the completed work will result in minimizing the availability of source metals contamination. The IDEQ will address water quality issues as part of its TMDL program by establishing metals load limits for Blue Joe Creek in 2005. The TMDL will require, by law, a TMDL implementation plan that may require additional projects aimed at reducing metals loading. [....] Compliance with the TMDL plan will be the responsibility of CLI, the property owner (EPA 2003)." -Removal Action Report Continental Mine. USEPA. January, 2004. Based on the above disclosure it is clear that Blue Joe needs to be in Section 5 and a TMDL does need to be developed unless the USFS or the land owner can provide Tier 1 data indicating that Blue Joe Creek meets Idaho WQS (WQS) and supports it's beneficial uses whereby a de-listing to Section 2 of the IR can be proposed. Alternatively, if interested parties can demonstrate a clear downward trend in metals concentrations and that remedial actions on Blue Joe Creek will result in WQS being attained and the beneficial uses being supported in a reasonable timeframe then a 4(b) justification could be proposed for the 2010 IR.
2.	ID17010104PN008_02	1	*We are concerned about the inappropriate listing of Long Canyon Creek in Section 5. The Long Canyon Tributary has virtually no human impacts, and has shown to be a "full support" stream. While this tributary may exceed temperature criteria, a Section 5 listing would appear to be inappropriate. This is a defacto wilderness type area—*	DEQ agrees that the temperature listing may not reflect natural stream temperatures and the land use activities in the watershed; however, using the current assessment methodology DEQ is required to list the assessment unit for temperature violations when temperature data is available. Continuous temperature data loggers deployed near the mouth of the stream, in the forested portion of the watershed, show violations of

			where no logical restoration activities could take place. The WAG Technical Committee also recognizes that most Westside (Kootenai River) tributaries are in similar condition to Long Canyon in the upper portions of the watersheds. It appears somewhat illogical to apply the Section 5 designation to "wilderness type" areas that are otherwise in "full support".	Idaho's numeric water quality criteria. Violations of this criteria warrant the assessment unit/temperature listing. Exceedances of water quality criteria will be reviewed during the five-year review period of the Kootenai/Moyie Subbasin Assessment and TMDL. During the five-year review the temperature listing will be evaluated against the natural conditions provision in the Idaho WQS. Evaluation against the natural condition provision will take into consideration land use activities in the watershed.
3.	ID17010104PN004_02	2	*The WAG has strong concern for the inappropriate proposed designation of Blue Joe Creek as a part of Section 5, Impaired Waters. We respectfully request that it be removed from Section 5 and listed in Section 4(b).*	DEQ's effort to document a Section 4(b) justification for the metals impairing Blue Joe Creek fell short as additional documentation from the CERCLA removal action on Blue Joe Creek was disclosed by EPA. Here is an excerpt from the 2004 Removal Action report: "…surface water and groundwater treatment was not addressed as part of the Removal Action. It is anticipated that beneficial effects from the completed work will result in minimizing the availability of source metals contamination. The IDEQ will address water quality issues as part of its TMDL program by establishing metals load limits for Blue Joe Creek in 2005. The TMDL will require, by law, a TMDL implementation plan that may require additional projects aimed at reducing metals loading. [....] Compliance with the TMDL plan will be the responsibility of CLI, the property owner (EPA 2003)." -Removal Action Report Continental Mine. USEPA. January, 2004. Based on the above disclosure it is clear that Blue Joe needs to be in Section 5 and a TMDL does need to be developed unless the USFS or the land owner can provide Tier 1 data indicating that Blue Joe Creek meets Idaho WQS and supports it's beneficial uses whereby a de-listing to Section 2 of the IR can be proposed. Alternatively, if interested parties can demonstrate a clear downward trend in metals concentrations and that remedial actions on Blue Joe Creek will result in WQS being attained and the beneficial uses being supported in a reasonable timeframe then a 4(b) justification could be proposed for the 2010 IR.
4.	ID17010104PN008_02	2	*We are concerned about the inappropriate listing of Long Canyon Creek in Section 5. The Long Canyon Tributary has virtually no human impacts, and has shown to be a "full support" stream. While this tributary may exceed temperature criteria, a Section 5 listing would appear to*	DEQ agrees that the temperature listing may not reflect natural stream temperatures and the land use activities in the watershed; however, using the current assessment methodology DEQ is required to list the assessment unit for temperature violations when temperature data is available. Continuous temperature data loggers deployed near the mouth

			be inappropriate. This is a defacto wilderness type area—where no logical restoration activities could take place. The WAG Technical Committee also recognizes that most Westside (Kootenai River) tributaries are in similar condition to Long Canyon in the upper portions of the watersheds. It appears somewhat illogical to apply the Section 5 designation to "wilderness type" areas that are otherwise in "full support".	of the stream, in the forested portion of the watershed, show violations of Idaho's numeric water quality criteria. Violations of this criteria warrant the assessment unit/temperature listing. Exceedances of water quality criteria will be reviewed during the five-year review period of the Kootenai/Moyie Subbasin Assessment and TMDL. During the five-year review the temperature listing will be evaluated against the natural conditions provision in the Idaho WQS. Evaluation against the natural condition provision will take into consideration land use activities in the watershed.
5.	ID16010202BR020_02a	3	*sediment: Proposing to de-list because applicable wqs attained, original basis for listing was incorrect. No additional information provided and in DEQ's online map based database, it states that this assessment unit is not assessed.*	Monitored in 1998 and physical substrate was deteremined to be an impairment and in all future re-monitirng visits the site has been dry. This site was place too far up in the watershed. No irrigation withdrwals are documented. As previously noted, a field visit to this site in 2003 indicated that it was dry and a Forest Service fish crew tried to survey this site in 2001 and noted that it was also dry. DEQ missapplied the BURP protocol in 1998 when in fact this waterbody is dry based on 3 visits.
6.	ID16010204BR013_02	3	*sediment and phosphorus: Proposing to de-list because flaws in original listing only justification is Intermittent stream. More justification should be provided.*	Segment and all attributes carried forward from 1998 list. Dry in 1996, 2003, and 2005 (see BURP information). Never assessed utilizing BURP protocol because it was dry every time. Irrigation not a factor.
7.	ID16010204BR013_03	3	*sediment and nutrient: Proposing to de-list because flaws in original listing only justification is Intermittent stream. More justification should be provided.*	Segment and all attributes carried forward from 1998 list. Upper portion dry, Spring-fed Lake Samaria diverted to ditch, original channel dry.
8.	ID17010104PN021_03	3	*Combined Biota: Proposing to de-list because of flaws in original listing, but no additional information is provided.*	Assessment unit was listed in 2002 for causes unknown and temperature, causes unknown was later changed to combined biota. During the development of the subbasin assessment, temperature and sediment were identified as impairing beneficial uses. Excess sediment was addressed and included in the Deep Creek sediment load calculations in the Kootenai/Moyie sediment TMDL (page 101). The temperature listing will be addressed during the five-year review of the Kootenai/Moyie temperature TMDL, until this review the assessment unit will remain listed for temperature.
9.	ID17010104PN027_02	3	*temperature: Proposing to de-list because of flaws in original listing, but no additional information is provided.*	Temperature data does not exist to support the listing of this assessment unit.
10.	ID17010104PN032_03	3	*temperature: Proposing to de-list because of flaws in original listing, but no additional information is provided.*	Listed in 2002 for temperature and listed in 2008 for Combined Biota/Habitat Bioassessment, the temperature listing should be carried from 2002 Integrated Report to 2008 Integrated Report. Temperature data for the assessment unit support the temperature listing. The Kootenai/Moyie SBA and TMDL was written using the EPA-approved 1998 §303(d) list. During the time of TMDL development temperature

				was not identified as a pollutant. Temperature listing will be addressed during the five-year review of the Kootenai/Moyie temperature TMDL.
11.	ID17010214PN003_02a	3	*sediment: Proposing to de-list because of flaws in original listing, but no additional information is provided.*	The assessment unit/pollutant (sediment) combination is included in section 4a of the 2002 integrated report. A sediment TMDL was completed and approved by EPA in 2001 (Clark Fork/Pend Oreille Sub-basin Assessment and TMDL pages 152-157). Temperature was the only identified pollutant in 2002 and the temperature listing was retained in 2008.
12.	ID17010214PN014_04	3	*sediment: Proposing to de-list because of flaws in original listing, but no additional information is provided.*	The assessment-pollutant (sediment) combination is included in section 4a of the 2002 integrated report. A sediment TMDL was completed and approved by EPA in 2001 (Clark Fork/Pend Oreille Sub-basin Assessment and TMDL pages 122-132). Temperature was the only identified pollutant in 2002 and the temperature listing was retained in 2008.
13.	ID17010214PN043_02	3	*combined biota: Proposing to de-list because of flaws in original listing. No additional information provided.*	Excess sediment was identified in the Pend Oreille Tributaries Sediment TMDL (DEQ 2007 – page 54) as contributing to nonattainment of all beneficial uses and a sediment TMDL was developed and approved by EPA (page 77). In addition to sediment, temperature has been identified as impairing beneficial uses and a temperature TMDL has been developed and submitted to EPA for approval. Excess solar load was identified by the Pend Oreille Lake Tributaries Temperature TMDL as contributing to the elevated stream temperature. Page 22 of the Pend Oreille Lake Tributaries Temperature TMDL outlines the existing and potential solar loads. Pollutants impairing beneficial uses have been identified and TMDLs have been completed.
14.	ID17010214PN049_02	3	*combined biota: Proposing to de-list because of flaws in original listing. No additional information provided.*	Excess sediment was identified in the Pend Oreille Tributaries Sediment TMDL (DEQ 2007 – page ES-9) as contributing to nonattainment of all beneficial uses and a sediment TMDL was developed and approved by EPA (page 77). In addition to sediment, temperature has been identified as impairing beneficial uses and a temperature TMDL has been developed and submitted to EPA for approval. Excess solar load was identified by the Pend Oreille Lake Tributaries Temperature TMDL as contributing to the elevated stream temperature. Page 28 of the Pend Oreille Lake Tributaries Temperature TMDL outlines the existing and potential solar loads. Pollutants impairing beneficial uses have been identified and TMDLs have been completed.
15.	ID17010214PN049_03	3	*combined biota: Proposing to de-list because of flaws in original listing. No additional information provided.*	Excess sediment was identified in the Pend Oreille Tributaries Sediment TMDL (DEQ 2007 – page ES-9) as contributing to nonattainment of all beneficial uses and a sediment TMDL was developed and approved by EPA (page 77). In addition to sediment, temperature has been identified

				as impairing beneficial uses and a temperature TMDL has been developed and submitted to EPA for approval. Excess solar load was identified by the Pend Oreille Lake Tributaries Temperature TMDL as contributing to the elevated stream temperature. Page 28 of the Pend Oreille Lake Tributaries Temperature TMDL outlines the existing and potential solar loads. Pollutants impairing beneficial uses have been identified and TMDLs have been completed.
16.	ID17010216PN002_08	3	*unknown: Proposing to de-list because of flaws in original listing. No additional information provided.*	During the development of the Pend Oreille River Subbasin Assessment and TMDL all potential pollutants contributing to beneficial use impairment were evaluated. During the evaluation the unknown pollutant was identified as temperature, total phosphorous, and total dissolved gas. Therefore the listing for unknown pollutant should be removed.
17.	ID17010216PN002_08	3	*unknown: Proposing to de-list because of flaws in original listing. No additional information provided.*	During the development of the Pend Oreille River Subbasin Assessment and TMDL all potential pollutants contributing to beneficial use impairment were evaluated. During the evaluation the unknown pollutant was identified as temperature, total phosphorous, and total dissolved gas. Therefore the listing for unknown pollutant should be removed.
18.	ID17010305PN003_04	3	*elemental phosphorus: Proposing to de-list because of flaws in original listing. No additional information provided.*	The elemental phosphorous listing was a mistake in its original listing. Elemental phosphorous is not noted as occurring the Spokane River. The listing has subsequently been corrected and changed to total phosphorous.
19.	ID17010305PN014_03	3	*nitrogen and phosphorus: Proposing to de-list because wqs being met. No additional information provided.*	Nitrogen and phosphorous load calculations are included in the SBA and TMDL of Lakes and Streams Located on or Draining to the Rathdrum Prairie page 44. Additional nutrients sampling in the summer of 2007 supports findings in the above mentioned TMDLs. No observations of Idaho's narrative nutrient water quality standard have been observed (Fish Creek Watershed Assessment and TMDL pages 40-42).
20.	ID17040208SK001_05	3	*combined biota and unknown: Proposing to de-list combined biota because other. Not clear why this is being de-listed. More information should be provided. Should it be 4a and not other? Proposing to de-list unknown because of flaws in original listing. No additional information provided.*	The TMDL addressed identified sediment and nutrients as pollutants; therefore, combined biota/habitat assessment and cause unknown are no longer relevant and have been removed from de-listings.
21.	ID17040208SK016_04	3	*unknown: Proposing to de-list because of flaws in original listing. No additional information provided.*	The TMDL addressed identified sediment and nutrients as pollutants; therefore, cause unknown is no longer relevant and has been removed from de-listings.
22.	ID17040210SK007_05	3	*ammonia and unknown: Proposing to de-list because of other. Unclear if ammonia was assessed. No justification*	Proposed delisting should have been WQS being met and have been changed. Data were presented and justification were presented on pages

			for the unknown. Talks about nutrients and DO.	99-103 of the Raft River TMDL. No exceedances of the chronic or acute ammonia criteria were observed. The nutrient discussion provided in the TMDL were inclusive of nitrogen, phosphorus and ammonia.
23.	ID17040213SK000_04	3	*unknown: Proposing to de-list because wqs being met, but doesn't state which standards are being met. See Salmon Falls SBA, no page number given. Should justification be other?*	Justification should be other. That change was made. See pages 89-94 of the Salmon Falls Creek SBA and TMDL
24.	ID17040213SK001_06	3	*fecal: Proposing to de-list because wqs being met. Justification cites Salmon Falls Creek SBA and TMDL, but does not cite specific pages. Need to know where in the document the justification is.*	See pages 127-143 of the Salmon Falls SBA and TMDL.
25.	ID17040213SK005_02	3	*fecal: Proposing to de-list because wqs being met. Justification cites Salmon Falls Creek SBA and TMDL, but does not cite specific pages. Need to know where in the document the justification is.*	See pages 100-101 of the Salmon Falls Creek SBA and TMDL.
26.	ID17040214SK015_05	3	*sediment: Proposing to de-list because wqs being met. No additional information provided.*	DEQ will delist sediment and implement the temp TMDL approved in 2005
27.	ID17040219SK002_06	3	*combined biota: Proposing to de-list because of other. Justification doesn't make sense. Also, says to see Big Wood TMDL, but does not cite specific pages. Need to know where in the document the justification is.*	The segment of the Big Wood River from Magic Reservoir Dam to mouth was included in The Big Wood River Watershed Management Plan, where TMDL's were developed with reductions in sediment and phosphorus.(see pages 73-75) For this reason "combined biota" and "unknown" were deleted. Total Phosphorus was added, moved to 4A and assigned a TMDL.
28.	ID17040219SK011_02	3	*combined biota: Proposing to de-list combined biota because other. No additional information provided.*	Combined Biota indicated the East Fork of the Big Wood River to be impaired, however combined biota is not a pollutant. The subbasin assessment determined the water quality to be supporting benefical uses, as demonstrated within the TMDL by 0.0% reductions for sediment, total phosphorus and e. coli. (See pg 72-76) Based on this infomation Combined Biota has been delisted.
29.	ID17040220SK011_02	3	*fecal and unknown: Proposing to de-list because wqs being met. See page 62 of Soldier Creek TMDL. I cannot find a Soldier Creek TMDL. Please provide the page from the TMDL.*	The Camas Creek Subbasin Assessment and TMDL, page 49-59 is an assessment of Soldier Creek and pg 163-167 identify TMDL components (load allocations and percent reductions). Specifically page 59 states "Bacteria are not impacting primary contact recreation benefical uses". Conclusions of the assessment found the lower 2/3 of the creek to be intermittent, water chemistry data indicated the water qualtiy sufficient to

				support beneficial uses and the hydrology of the water body was likely the largest impairment. While nutrients and bacteria were not impacting water quality, sediment and elevated temperature were not sufficient to support beneficial uses. Because a thorough assement of Soldier Creek has been completed, "Unknown" was delisted. Sediment and temperature have been added, moved to the 4A catagory and associated with the Camas Creek TMDL.
30.	ID17050104SW023_04	3	*e. coli: Proposing to de-list because wqs being met. The justification references Shoofly Creek not Battle Creek.*	I accidentally referenced the wrong part of the TMDL. The correct reference is from page 60 of the Upper Owyhee TMDL: "The remoteness of access sites on Battle Creek greatly hampered the ability to gather samples in 2000 and 2001. Samples were collected at three sites in 2001. All samples were below the WQS criteria for the support of PCR and SCR. The results of the three (3) samples are shown in Table 21. Idaho DEQ will remove bacteria as a pollutant in Battle Creek on Idaho's 2002 §303(d) list. **Table 21. Bacteria Monitoring Results for Battle Creek, 2001. Upper Owyhee Watershed.** Station — Date — E. coli (Number/100 ml) Battle Creek downstream of Big Spring Creek — July 10, 2001 — 12 Battle Creek upstream of Big Spring Creek — July 10, 2001 — 27 Battle Creek at Upper Crossing — July 10, 2001 — 90
31.	ID17060108CL002_03	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID17060108CL002_03 showing that EPA has approved a TMDL for TEMPERATURE. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the

				approved TMDL by moving the AU-Pollutant Combination to Section 4a.
32.	ID17060108CL002_03	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID17060108CL002_03 showing that EPA has approved a TMDL for TOTAL PHOSPHORUS. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
33.	ID17060108CL002_03	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID17060108CL002_03 showing that EPA has approved a TMDL for TOTAL SUSPENDED SOLIDS. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
34.	ID17060108CL002_03	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID17060108CL002_03 showing that EPA has approved a TMDL for E. COLI. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
35.	ID17060108CL003_02	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID17060108CL003_02 showing that EPA has approved a TMDL for E. COLI. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
36.	ID17060108CL003_02	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID17060108CL003_02 showing that EPA has

			status." What does that mean?	approved a TMDL for TEMPERATURE. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
37.	ID17060108CL003_02	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID17060108CL003_02 showing that EPA has approved a TMDL for TOTAL PHOSPHORUS. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
38.	ID17060108CL003_02	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID17060108CL003_02 showing that EPA has approved a TMDL for TOTAL SUSPENDED SOLIDS. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
39.	ID17060108CL003_03	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID17060108CL003_03 showing that EPA has approved a TMDL for TEMPERATURE. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
40.	ID17060108CL003_03	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID17060108CL003_03 showing that EPA has approved a TMDL for TOTAL PHOSPHORUS. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status"

				to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
41.	ID17060108CL003_03	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID17060108CL003_03 showing that EPA has approved a TMDL for E. COLI. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
42.	ID17060108CL003_03	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID17060108CL003_03 showing that EPA has approved a TMDL for TOTAL SUSPENDED SOLIDS. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
43.	ID17060108CL011b_03	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID3123 showing that EPA has approved a TMDL for BACTERIA. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
44.	ID17060108CL011b_03	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID3123 showing that EPA has approved a TMDL for NUTRIENTS. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
45.	ID17060108CL011b_03	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID3123 showing that EPA has approved a TMDL for SEDIMENT. When the 2002 IR was approved this AU-Pollutant

				Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
46.	ID17060108CL011b_03	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID3123 showing that EPA has approved a TMDL for TEMPERATURE. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
47.	ID17060108CL012_03	3	*temperature and nutrients: Proposing to de-list because wqs being met. Justification states that these were removed as candidate cause in the Palouse River TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID3124 showing that EPA has approved a TMDL for TEMPERATURE.
48.	ID17060108CL013a_02	3	*temperature and nutrients: Proposing to de-list because wqs being met. Justification states that these were removed as candidate cause in the Palouse River TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID3124 showing that EPA has approved a TMDL for TEMPERATURE.
49.	ID17060108CL013b_03	3	*temperature and nutrients: Proposing to de-list because wqs being met. Justification states that these were removed as candidate cause in the Palouse River TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID3124 showing that EPA has approved a TMDL for TEMPERATURE.
50.	ID17060108CL014a_02	3	*e. coli and sediment: Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID3118 showing that EPA has approved a TMDL for BACTERIA. ATTAINS should be modified to show this TMDL as e. coli and not Bacteria. This is an appropriate de-listing.
51.	ID17060108CL014a_02	3	*e. coli and sediment: Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID3118 showing that EPA has approved a TMDL for SEDIMENT. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.

52.	ID17060108CL014a_02	3	*temperature and nutrients: Proposing to de-list because wqs being met. Justification states that these were removed as candidate cause in the Palouse River TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID3118 showing that EPA has approved a TMDL for TEMPERATURE.
53.	ID17060108CL014a_02	3	*e. coli and sediment: Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID3118 showing that EPA has approved a TMDL for TEMPERATURE. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
54.	ID17060108CL015a_02	3	*nutrients: Proposing to de-list because wqs being met. Justification states that this was removed as candidate cause in the Palouse River TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID3126 showing that EPA has approved a TMDL for NUTRIENTS.
55.	ID17060108CL032b_03	3	*nutrients: Nutrients proposed for delisting because wqs being met. Justification states that these were removed as candidate cause in the Palouse River TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	The assessment database has been up-dated to reference the specific page(s) in the document.
56.	ID17060210SL001_02a	3	*sediment: Proposing to de-list because wqs being met. Justification cites WBAG II using BURP data. No additional information provided.*	see page 122-123 of Little Salmon River Subbasin Assessment and TMDL (DEQ 2006) Also, BURP scores indicate that the creek is fully supporting its beneficial uses. Overall score = 2.5 out of 3.
57.	ID17060305CL007_02	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID5644 showing that EPA has approved a TMDL for PATHOGENS. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
58.	ID17060305CL007_02	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID5644 showing that EPA has approved a TMDL for SEDIMENT. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved

				TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
59.	ID17060305CL007_02	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID5644 showing that EPA has approved a TMDL for NUTRIENTS. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
60.	ID17060305CL007_02	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID5644 showing that EPA has approved a TMDL for DISSOLVED OXYGEN. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
61.	ID17060305CL007_02	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID5644 showing that EPA has approved a TMDL for TEMPERATURE. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
62.	ID17060305CL007_03	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID5644 showing that EPA has approved a TMDL for DISSOLVED OXYGEN. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
63.	ID17060305CL007_03	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID5644 showing that EPA has approved a TMDL for

			status." What does that mean?	NUTRIENTS. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
64.	ID17060305CL007_03	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID5644 showing that EPA has approved a TMDL for PATHOGENS. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
65.	ID17060305CL007_03	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID5644 showing that EPA has approved a TMDL for SEDIMENT. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
66.	ID17060305CL007_03	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID5644 showing that EPA has approved a TMDL for TEMPERATURE. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
67.	ID17060305CL008_02	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID3290 showing that EPA has approved a TMDL for SEDIMENT. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
68.	ID17060305CL008_02	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID3290 showing that EPA has approved a TMDL for

			status." What does that mean?	TEMPERATURE. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
69.	ID17060305CL008_02	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID3290 showing that EPA has approved a TMDL for NUTRIENTS. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
70.	ID17060305CL008_02	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID3290 showing that EPA has approved a TMDL for DISSOLVED OXYGEN. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
71.	ID17060305CL008_02	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID3290 showing that EPA has approved a TMDL for PATHOGENS. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
72.	ID17060305CL008_03	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID3290 showing that EPA has approved a TMDL for DISSOLVED OXYGEN. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.

73.	ID17060305CL008_03	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID3290 showing that EPA has approved a TMDL for NUTRIENTS. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
74.	ID17060305CL008_03	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID3290 showing that EPA has approved a TMDL for PATHOGENS. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
75.	ID17060305CL008_03	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID3290 showing that EPA has approved a TMDL for SEDIMENT. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
76.	ID17060305CL008_03	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID3290 showing that EPA has approved a TMDL for TEMPERATURE. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
77.	ID17060305CL010_02	3	*ammonia: Ammonia proposed for delisting because wqs being met. Justification states that this is being removed as candidate cause in the S. Fork Clearwater River TMDL, however the specific page is not cited. Need to know where in the document this information is located. Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	The assessment database has been up-dated to reference the specific page(s)in the South Fork Clearwater River TMDL. "Changed support status" means the status of the cause of impairment for the beneficial use was changed in the 2008 Integrated Report from Category 5 to Category 4a, TMDL approved.

78.	ID17060305CL010_03	3	*Ammonia: Proposed for delisting because wqs being met. Justification states that this is being removed as candidate cause in the S. Fork Clearwater River TMDL, however the specific page is not cited. Need to know where in the document this information is located. Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	The assessment database has been up-dated to reference the specific pages in the SF Clearwater TMDL. "Changed support status" means the status of the cause of impairment for the beneficial use was changed in the 2008 Integrated Report from Category 5 to Category 4a, TMDL approved.
79.	ID17060305CL012_05	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID5185 showing that EPA has approved a TMDL for TEMPERATURE. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
80.	ID17060305CL012_05	3	*Proposing to de-list because TMDL approved which is fine. However, in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID5185 showing that EPA has approved a TMDL for SEDIMENT. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
81.	ID17060305CL013_02	3	*Proposing to de-list because TMDL approved which is fine. However,in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_71 showing that EPA has approved a TMDL for TEMPERATURE. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the approved TMDL by moving the AU-Pollutant Combination to Section 4a.
82.	ID17060305CL013_03	3	*Proposing to de-list because TMDL approved which is fine. However,in justification it states "Changed support status." What does that mean?*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_71 showing that EPA has approved a TMDL for TEMPERATURE. When the 2002 IR was approved this AU-Pollutant Combination was deleted because there was no way to track approved TMDLs in ADB1. To document this in ADB2 and to make the 2008 IR correct DEQ had to "change the support status" to not supporting, add this pollutant back into ADB then document the

				approved TMDL by moving the AU-Pollutant Combination to Section 4a.
83.	ID17060305CL014_04	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_72 showing that EPA has approved a TMDL for TEMPERATURE.
84.	ID17060305CL015_03	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_73 showing that EPA has approved a TMDL for TEMPERATURE.
85.	ID17060305CL017_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_75 showing that EPA has approved a TMDL for TEMPERATURE.
86.	ID17060305CL017_03	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_75 showing that EPA has approved a TMDL for TEMPERATURE.
87.	ID17060305CL024_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_81 showing that EPA has approved a TMDL for TEMPERATURE.
88.	ID17060305CL024_03	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_81 showing that EPA has approved a TMDL for TEMPERATURE.
89.	ID17060305CL025_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_82 showing that EPA has approved a TMDL for TEMPERATURE.
90.	ID17060305CL025_04	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_82 showing that EPA has approved a TMDL for TEMPERATURE.
91.	ID17060305CL026_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_83 showing that EPA has approved a TMDL for TEMPERATURE.
92.	ID17060305CL026_03	3	*Temperature, water: Delisting justification states*	Please note that ATTAINS has record of this AU-Pollutant Combination

			'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided	under State List ID ID_UNL_83 showing that EPA has approved a TMDL for TEMPERATURE.
93.	ID17060305CL027_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_84 showing that EPA has approved a TMDL for TEMPERATURE.
94.	ID17060305CL028_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_85 showing that EPA has approved a TMDL for TEMPERATURE.
95.	ID17060305CL029_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_86 showing that EPA has approved a TMDL for TEMPERATURE.
96.	ID17060305CL029_03	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_86 showing that EPA has approved a TMDL for TEMPERATURE.
97.	ID17060305CL032_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_88 showing that EPA has approved a TMDL for TEMPERATURE.
98.	ID17060305CL032_03	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_88 showing that EPA has approved a TMDL for TEMPERATURE.
99.	ID17060305CL033_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_89 showing that EPA has approved a TMDL for TEMPERATURE.
100.	ID17060305CL034_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_90 showing that EPA has approved a TMDL for TEMPERATURE.
101.	ID17060305CL035_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_91 showing that EPA has approved a TMDL for TEMPERATURE.

102.	ID17060305CL037_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_92 showing that EPA has approved a TMDL for TEMPERATURE.
103.	ID17060305CL037_04	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_92 showing that EPA has approved a TMDL for TEMPERATURE.
104.	ID17060305CL037_04	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID5185 showing that EPA has approved a TMDL for SEDIMENT. This ATTAINS record should be checked for accuracy and then either changed to temperature or have an additional record added for temperature.
105.	ID17060305CL038_02	3	*sediment: Sediment proposed for delisting because wqs being met. Justification states that this is being removed as candidate cause in the S. Fork Clearwater River TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	The assessment database has been up-dated to reference the specific page(s) in the SF Clearwater River TMDL.
106.	ID17060305CL038_02	3	*Sedimentation/Siltation: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	The assessment database has been up-dated to reference the specific page(s) in the SF Clearwater River TMDL.
107.	ID17060305CL038_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	The assessment database has been up-dated to reference the specific page(s) in the SF Clearwater River TMDL.
108.	ID17060305CL038_02a	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_93 showing that EPA has approved a TMDL for TEMPERATURE.
109.	ID17060305CL038_04	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_93 showing that EPA has approved a TMDL for TEMPERATURE.
110.	ID17060305CL039_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_94 showing that EPA has approved a TMDL for TEMPERATURE.
111.	ID17060305CL039_03	3	*Temperature, water: Delisting justification states*	Please note that ATTAINS has record of this AU-Pollutant Combination

			'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided	under State List ID ID_UNL_94 showing that EPA has approved a TMDL for TEMPERATURE.
112.	ID17060305CL040_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_95 showing that EPA has approved a TMDL for TEMPERATURE.
113.	ID17060305CL040_03	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_95 showing that EPA has approved a TMDL for TEMPERATURE.
114.	ID17060305CL041_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_96 showing that EPA has approved a TMDL for TEMPERATURE.
115.	ID17060305CL041_03	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_96 showing that EPA has approved a TMDL for TEMPERATURE.
116.	ID17060305CL042_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_97 showing that EPA has approved a TMDL for TEMPERATURE.
117.	ID17060305CL042_03	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_97 showing that EPA has approved a TMDL for TEMPERATURE.
118.	ID17060305CL043_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_98 showing that EPA has approved a TMDL for TEMPERATURE.
119.	ID17060305CL044_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_99 showing that EPA has approved a TMDL for TEMPERATURE.
120.	ID17060305CL045_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_100 showing that EPA has approved a TMDL for TEMPERATURE.

121.	ID17060305CL045_03	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_100 showing that EPA has approved a TMDL for TEMPERATURE.
122.	ID17060305CL046_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_101 showing that EPA has approved a TMDL for TEMPERATURE.
123.	ID17060305CL047_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_102 showing that EPA has approved a TMDL for TEMPERATURE.
124.	ID17060305CL048_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_103 showing that EPA has approved a TMDL for TEMPERATURE.
125.	ID17060305CL049_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_104 showing that EPA has approved a TMDL for TEMPERATURE.
126.	ID17060305CL050_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_105 showing that EPA has approved a TMDL for TEMPERATURE.
127.	ID17060305CL051_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_106 showing that EPA has approved a TMDL for TEMPERATURE.
128.	ID17060305CL052_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_107 showing that EPA has approved a TMDL for TEMPERATURE.
129.	ID17060305CL052_04	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_107 showing that EPA has approved a TMDL for TEMPERATURE.
130.	ID17060305CL053_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_108 showing that EPA has approved a TMDL for TEMPERATURE.

			description of the rationale shouild be provided	
131.	ID17060305CL053_03	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_108 showing that EPA has approved a TMDL for TEMPERATURE.
132.	ID17060305CL054_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_109 showing that EPA has approved a TMDL for TEMPERATURE.
133.	ID17060305CL054_03	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_109 showing that EPA has approved a TMDL for TEMPERATURE
134.	ID17060305CL055_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_110 showing that EPA has approved a TMDL for TEMPERATURE.
135.	ID17060305CL055_03	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_110 showing that EPA has approved a TMDL for TEMPERATURE.
136.	ID17060305CL056_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_111 showing that EPA has approved a TMDL for TEMPERATURE.
137.	ID17060305CL056_03	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_111 showing that EPA has approved a TMDL for TEMPERATURE.
138.	ID17060305CL057_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID2089 showing that EPA has approved a TMDL for TEMPERATURE.
139.	ID17060305CL058_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID2088 showing that EPA has approved a TMDL for TEMPERATURE.
140.	ID17060305CL058_03	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID2088 showing that EPA has approved a TMDL for

			TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided	TEMPERATURE.
141.	ID17060305CL059_02	3	*sediment: Sediment proposed for delisting because wqs being met. Justification states that this is being removed as candidate cause in the S. Fork Clearwater River TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	The assessment database has been up-dated to reference the specific pages in the document.
142.	ID17060305CL059_02	3	*Sedimentation/Siltation: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	The assessment database has been up-dated to reference the specific pages in the document.
143.	ID17060305CL059_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	The assessment database has been up-dated to reference the specific pages in the document.
144.	ID17060305CL060_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_113 showing that EPA has approved a TMDL for TEMPERATURE.
145.	ID17060305CL061_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_114 showing that EPA has approved a TMDL for TEMPERATURE.
146.	ID17060305CL062_02	3	*sediment: Sediment proposed for delisting because wqs being met. Justification states that this is being removed as candidate cause in the S. Fork Clearwater River TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	The assessment database has been up-dated to reference the specific pages in the document.
147.	ID17060305CL062_02	3	*Sedimentation/Siltation: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	The assessment database has been up-dated to reference the specific pages in the document.
148.	ID17060305CL062_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	The assessment database has been up-dated to reference the specific pages in the document.
149.	ID17060305CL062_04	3	*sediment: Sediment proposed for delisting because wqs being met. Justification states that this is being removed as candidate cause in the S. Fork Clearwater River TMDL,*	The assessment database has been up-dated to reference the specific pages in the document.

			however the specific page is not cited. Need to know where in the document this information is located.	
150.	ID17060305CL062_04	3	*Sedimentation/Siltation: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	The assessment database has been up-dated to reference the specific pages in the document.
151.	ID17060305CL062_04	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	The assessment database has been up-dated to reference the specific pages in the document.
152.	ID17060305CL063_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_116 showing that EPA has approved a TMDL for TEMPERATURE.
153.	ID17060305CL064_02	3	*sediment: Sediment proposed for delisting because wqs being met. Justification states that this is being removed as candidate cause in the S. Fork Clearwater River TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	The assessment database has been up-dated to reference the specific pages in the document.
154.	ID17060305CL064_02	3	*Sedimentation/Siltation: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	The assessment database has been up-dated to reference the specific pages in the document.
155.	ID17060305CL064_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	The assessment database has been up-dated to reference the specific pages in the document.
156.	ID17060305CL065_02	3	*sediment: Sediment proposed for delisting because wqs being met. Justification states that this is being removed as candidate cause in the S. Fork Clearwater River TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	The assessment database has been up-dated to reference the specific pages in the document.
157.	ID17060305CL065_02	3	*Sedimentation/Siltation: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	The assessment database has been up-dated to reference the specific pages in the document.
158.	ID17060305CL065_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a*	The assessment database has been up-dated to reference the specific pages in the document.

			description of the rationale shouild be provided	
159.	ID17060305CL066_04	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_118 showing that EPA has approved a TMDL for TEMPERATURE.
160.	ID17060305CL067_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_119 showing that EPA has approved a TMDL for TEMPERATURE.
161.	ID17060305CL067_03	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_119 showing that EPA has approved a TMDL for TEMPERATURE.
162.	ID17060305CL068_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_120 showing that EPA has approved a TMDL for TEMPERATURE.
163.	ID17060305CL068_03	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_120 showing that EPA has approved a TMDL for TEMPERATURE.
164.	ID17060305CL069_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_121 showing that EPA has approved a TMDL for TEMPERATURE.
165.	ID17060305CL070_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_123 showing that EPA has approved a TMDL for TEMPERATURE.
166.	ID17060305CL071_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_124 showing that EPA has approved a TMDL for TEMPERATURE.
167.	ID17060305CL071_03	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_124 showing that EPA has approved a TMDL for TEMPERATURE.
168.	ID17060305CL072_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_125 showing that EPA has approved a

			TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided	TMDL for TEMPERATURE.
169.	ID17060305CL073_02	3	*sediment: Sediment proposed for delisting because wqs being met. Justification states that this is being removed as candidate cause in the S. Fork Clearwater River TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	The assessment database has been up-dated to reference the specific pages in the document.
170.	ID17060305CL073_02	3	*Sedimentation/Siltation: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	The assessment database has been up-dated to reference the specific pages in the document.
171.	ID17060305CL073_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	The assessment database has been up-dated to reference the specific pages in the document.
172.	ID17060305CL074_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_127 showing that EPA has approved a TMDL for TEMPERATURE.
173.	ID17060305CL074_02a	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_127 showing that EPA has approved a TMDL for TEMPERATURE.
174.	ID17060305CL075_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_128 showing that EPA has approved a TMDL for TEMPERATURE.
175.	ID17060305CL076_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_129 showing that EPA has approved a TMDL for TEMPERATURE.
176.	ID17060305CL077_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_130 showing that EPA has approved a TMDL for TEMPERATURE.
177.	ID17060305CL077_02a	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_130 showing that EPA has approved a TMDL for TEMPERATURE.

178.	ID17060305CL077_03	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_130 showing that EPA has approved a TMDL for TEMPERATURE.
179.	ID17060305CL078_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_131 showing that EPA has approved a TMDL for TEMPERATURE.
180.	ID17060305CL079_02	3	*sediment: Sediment proposed for delisting because wqs being met. Justification states that this is being removed as candidate cause in the S. Fork Clearwater River TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	The assessment database has been up-dated to reference the specific pages in the document.
181.	ID17060305CL079_02	3	*Sedimentation/Siltation: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	The assessment database has been up-dated to reference the specific pages in the document.
182.	ID17060305CL079_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	The assessment database has been up-dated to reference the specific pages in the document.
183.	ID17060305CL080_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_133 showing that EPA has approved a TMDL for TEMPERATURE.
184.	ID17060305CL080_03	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_133 showing that EPA has approved a TMDL for TEMPERATURE.
185.	ID17060305CL081_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_134 showing that EPA has approved a TMDL for TEMPERATURE.
186.	ID17060305CL081_03	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_134 showing that EPA has approved a TMDL for TEMPERATURE.
187.	ID17060305CL082_02	3	*Temperature, water: Delisting justification states 'Changed Support Status to document and EPA approved*	Please note that ATTAINS has record of this AU-Pollutant Combination under State List ID ID_UNL_135 showing that EPA has approved a

			TMDL.' The sepcific TMDL and a reference to a description of the rationale shouild be provided	TMDL for TEMPERATURE.
188.	ID17060306CL044_06	3	*Ammonia, e. coli, oil and Grease, DO, nutrients and organic enrichment: All proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Potlatch River TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	The assessment database has been up-dated to reference the specific pages in the document.
189.	ID17060306CL045_05	3	*e. coli, sediment and nutrients: All proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Potlatch River TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	This has been corrected. This assessment unit is addressed in the Potlatch River Subbasin Assessment and TMDL draft document, which is scheduled for public comment in April, 2008. The assessment database has been up-dated to show the specific page citation in the Potlatch River Subbasin Assessment and TMDL draft document.
190.	ID17060306CL048_04	3	*e. coli, sediment, nutrients: All proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Potlatch River TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	This has been corrected. This assessment unit is addressed in the Potlatch River Subbasin Assessment and TMDL draft document, which is scheduled for public comment in April, 2008. The assessment database has been up-dated to show the specific page citation in the Potlatch River Subbasin Assessment and TMDL draft document.
191.	ID17060306CL048_05	3	*e.coli, sediment, nutrients: All proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Potlatch River TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	This has been corrected. This assessment unit is addressed in the Potlatch River Subbasin Assessment and TMDL draft document, which is scheduled for public comment in April, 2008. The assessment database has been up-dated to show the specific page citation in the Potlatch River Subbasin Assessment and TMDL draft document.
192.	ID17060306CL049_02	3	*sediment and nutrients: All proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Potlatch River TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	This has been corrected. This assessment unit is addressed in the Potlatch River Subbasin Assessment and TMDL draft document, which is scheduled for public comment in April, 2008. The assessment database has been up-dated to show the specific page citation in the Potlatch River Subbasin Assessment and TMDL draft document.
193.	ID17060306CL049_03	3	*sediment and nutrients: All proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Potlatch River TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	This has been corrected. This assessment unit is addressed in the Potlatch River Subbasin Assessment and TMDL draft document, which is scheduled for public comment in April, 2008. The assessment database has been up-dated to show the specific page citation in the Potlatch River Subbasin Assessment and TMDL draft document.
194.	ID17060306CL049_04	3	*sediment and nutrients: All proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Potlatch River TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	This has been corrected. This assessment unit is addressed in the Potlatch River Subbasin Assessment and TMDL draft document, which is scheduled for public comment in April, 2008. The assessment database has been up-dated to show the specific page citation in the Potlatch River Subbasin Assessment and TMDL draft document.
195.	ID17060306CL051_04	3	*e. coli, sediment and Nutrients: All proposed for delisting*	This has been corrected. This assessment unit is addressed in the

			because wqs being met. Justification states that these are being removed as candidate cause in the Potlatch River TMDL, however the specific page is not cited. Need to know where in the document this information is located.	Potlatch River Subbasin Assessment and TMDL draft document, which is scheduled for public comment in April, 2008. The assessment database has been up-dated to show the specific page citation in the Potlatch River Subbasin Assessment and TMDL draft document.
196.	ID17060306CL052_03	3	*sediment and nutrients: All proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Potlatch River TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	This has been corrected. This assessment unit is addressed in the Potlatch River Subbasin Assessment and TMDL draft document, which is scheduled for public comment in April, 2008. The assessment database has been up-dated to show the specific page citation in the Potlatch River Subbasin Assessment and TMDL draft document.
197.	ID17060306CL053_02	3	*sediment, pH, nutrients: All proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Potlatch River TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	This has been corrected. This assessment unit is addressed in the Potlatch River Subbasin Assessment and TMDL draft document, which is scheduled for public comment in April, 2008. The assessment database has been up-dated to show the specific page citation in the Potlatch River Subbasin Assessment and TMDL draft document.
198.	ID17060306CL053_03	3	*sediment, pH, nutrients: All proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Potlatch River TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	This has been corrected. This assessment unit is addressed in the Potlatch River Subbasin Assessment and TMDL draft document, which is scheduled for public comment in April, 2008. The assessment database has been up-dated to show the specific page citation in the Potlatch River Subbasin Assessment and TMDL draft document.
199.	ID17060306CL054_02	3	*sediment: Sediment proposed for delisting because wqs being met. Justification states that this is being removed as candidate cause in the Potlatch River TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	This has been corrected. This assessment unit is addressed in the Potlatch River Subbasin Assessment and TMDL draft document, which is scheduled for public comment in April, 2008. The assessment database has been up-dated to show the specific page citation in the Potlatch River Subbasin Assessment and TMDL draft document.
200.	ID17060306CL054_03	3	*sediment: Sediment proposed for delisting because wqs being met. Justification states that this is being removed as candidate cause in the Potlatch River TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	This has been corrected. This assessment unit is addressed in the Potlatch River Subbasin Assessment and TMDL draft document, which is scheduled for public comment in April, 2008. The assessment database has been up-dated to show the specific page citation in the Potlatch River Subbasin Assessment and TMDL draft document.
201.	ID17060306CL055_02	3	*Ammonia, e. coli, and oil and grease, DO: All proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Potlatch River TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	This has been corrected. This assessment unit is addressed in the Potlatch River Subbasin Assessment and TMDL draft document, which is scheduled for public comment in April, 2008. The assessment database has been up-dated to show the specific page citation in the Potlatch River Subbasin Assessment and TMDL draft document.
202.	ID17060306CL055_03	3	*Ammonia, e. coli, oil and grease and DO: Ammonia, e. coli, oil and grease and DO All proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Potlatch River TMDL, however the specific page is not cited. Need to*	This has been corrected. This assessment unit is addressed in the Potlatch River Subbasin Assessment and TMDL draft document, which is scheduled for public comment in April, 2008. The assessment database has been up-dated to show the specific page citation in the Potlatch River Subbasin Assessment and TMDL draft document.

			know where in the document this information is located.	
203.	ID17060306CL062_02	3	*nutrients: Nutrients proposed for delisting because wqs being met. Justification states that this is being removed as candidate cause in the Potlatch River TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	This has been corrected. This assessment unit is addressed in the Potlatch River Subbasin Assessment and TMDL draft document, which is scheduled for public comment in April, 2008. The assessment database has been up-dated to show the specific page citation in the Potlatch River Subbasin Assessment and TMDL draft document.
204.	ID17060306CL062_03	3	*nutrients: Nutrients proposed for delisting because wqs being met. Justification states that this is being removed as candidate cause in the Potlatch River TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	This has been corrected. This assessment unit is addressed in the Potlatch River Subbasin Assessment and TMDL draft document, which is scheduled for public comment in April, 2008. The assessment database has been up-dated to show the specific page citation in the Potlatch River Subbasin Assessment and TMDL draft document.
205.	ID17060308CL002_04a	3	*nutrients: Nutrients proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Lower North Fork Clearwater TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	The assessment database has been up-dated to reference the specific page(s) in the Lower NF Clearwater River Subbasin Assessment and TMDL.
206.	ID17060308CL009_02c	3	*Sedimentation/Siltation: Proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Lower North Fork Clearwater TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	The assessment database has been up-dated to reference the specific page(s) in the Lower NF Clearwater River Subbasin Assessment and TMDL.
207.	ID17060308CL009_02e	3	*Sedimentation/Siltation: Proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Lower North Fork Clearwater TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	The assessment database has been up-dated to reference the specific page(s) in the Lower NF Clearwater River Subbasin Assessment and TMDL.
208.	ID17060308CL009_03	3	*Sedimentation/Siltation: Proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Lower North Fork Clearwater TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	The assessment database has been up-dated to reference the specific page(s) in the Lower NF Clearwater River Subbasin Assessment and TMDL.
209.	ID17060308CL009_04	3	*Sedimentation/Siltation: Proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Lower North Fork Clearwater TMDL, however the specific page is not cited. Need to know where in the document this information is*	The assessment database has been up-dated to reference the specific page(s) in the Lower NF Clearwater River Subbasin Assessment and TMDL.

			located.	
210.	ID17060308CL010_02c	3	*Sedimentation/Siltation: Proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Lower North Fork Clearwater TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	The assessment database has been up-dated to reference the specific page(s) in the Lower NF Clearwater River Subbasin Assessment and TMDL.
211.	ID17060308CL010_03	3	*Sedimentation/Siltation: Proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Lower North Fork Clearwater TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	The assessment database has been up-dated to reference the specific page(s) in the Lower NF Clearwater River Subbasin Assessment and TMDL.
212.	ID17060308CL020_04	3	*Oxygen, Dissolved: Proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Lower North Fork Clearwater TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	The assessment database has been up-dated to reference the specific page(s) in the Lower NF Clearwater River Subbasin Assessment and TMDL.
213.	ID17060308CL020_04	3	*Sedimentation/Siltation: Proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Lower North Fork Clearwater TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	The assessment database has been up-dated to reference the specific page(s) in the Lower NF Clearwater River Subbasin Assessment and TMDL.
214.	ID17060308CL020_04a	3	*Oxygen, Dissolved: Proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Lower North Fork Clearwater TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	The assessment database has been up-dated to reference the specific page(s) in the Lower NF Clearwater River Subbasin Assessment and TMDL.
215.	ID17060308CL020_04a	3	*Sedimentation/Siltation: Proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Lower North Fork Clearwater TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	This is incorrect; sedimentation is not proposed for delisting as sediment levels are impairing water quality to the degree that beneficial uses are not being met (page 49) and a sediment TMDL was completed for Breakfast Creek (approved January 2003). This assessment unit is listed in Category 4a of the 2008 Integrated Report for sediment.
216.	ID17060308CL021_02a	3	*Oxygen, Dissolved: Proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Lower North Fork*	The assessment database has been up-dated to reference the specific page(s) in the Lower NF Clearwater River Subbasin Assessment and TMDL.

			Clearwater TMDL, however the specific page is not cited. Need to know where in the document this information is located.	
217.	ID17060308CL021_02a	3	*Sedimentation/Siltation: Proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Lower North Fork Clearwater TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	The assessment database has been up-dated to reference the specific page(s) in the Lower NF Clearwater River Subbasin Assessment and TMDL.
218.	ID17060308CL021_03	3	*Oxygen, Dissolved: Proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Lower North Fork Clearwater TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	The assessment database has been up-dated to reference the specific page(s) in the Lower NF Clearwater River Subbasin Assessment and TMDL.
219.	ID17060308CL021_03	3	*Sedimentation/Siltation: Proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Lower North Fork Clearwater TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	The assessment database has been up-dated to reference the specific page(s) in the Lower NF Clearwater River Subbasin Assessment and TMDL.
220.	ID17060308CL021_03a	3	*Oxygen, Dissolved: Proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Lower North Fork Clearwater TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	The assessment database has been up-dated to reference the specific page(s) in the Lower NF Clearwater River Subbasin Assessment and TMDL.
221.	ID17060308CL021_03a	3	*Sedimentation/Siltation: Proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Lower North Fork Clearwater TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	The assessment database has been up-dated to reference the specific page(s) in the Lower NF Clearwater River Subbasin Assessment and TMDL.
222.	ID17060308CL023_02	3	*Oxygen, Dissolved: Proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Lower North Fork Clearwater TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	The assessment database has been up-dated to reference the specific page(s) in the Lower NF Clearwater River Subbasin Assessment and TMDL.

223.	ID17060308CL023_02	3	*Sedimentation/Siltation: Proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Lower North Fork Clearwater TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	The assessment database has been up-dated to reference the specific page(s) in the Lower NF Clearwater River Subbasin Assessment and TMDL.
224.	ID17060308CL023_02a	3	*Oxygen, Dissolved: Proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Lower North Fork Clearwater TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	The assessment database has been up-dated to reference the specific page(s) in the Lower NF Clearwater River Subbasin Assessment and TMDL.
225.	ID17060308CL023_02a	3	*Sedimentation/Siltation: Proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Lower North Fork Clearwater TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	The assessment database has been up-dated to reference the specific page(s) in the Lower NF Clearwater River Subbasin Assessment and TMDL.
226.	ID17060308CL023_03	3	*Oxygen, Dissolved: Proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Lower North Fork Clearwater TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	The assessment database has been up-dated to reference the specific page(s) in the Lower NF Clearwater River Subbasin Assessment and TMDL.
227.	ID17060308CL023_03	3	*Sedimentation/Siltation: Proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Lower North Fork Clearwater TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	The assessment database has been up-dated to reference the specific page(s) in the Lower NF Clearwater River Subbasin Assessment and TMDL.
228.	ID17060308CL025_02	3	*Oxygen, Dissolved: Proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Lower North Fork Clearwater TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	The assessment database has been up-dated to reference the specific page(s) in the Lower NF Clearwater River Subbasin Assessment and TMDL.
229.	ID17060308CL025_02	3	*Sedimentation/Siltation: Proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Lower North Fork Clearwater TMDL, however the specific page is not cited.*	This is incorrect; sedimentation is not proposed for delisting as sediment levels are impairing water quality to the degree that beneficial uses are not being met (page 48-49) and a sediment TMDL was completed for Breakfast Creek (approved January 2003). This assessment unit is listed

			Need to know where in the document this information is located.	in Category 4a of the 2008 Integrated Report for sediment.
230.	ID17060308CL034_03	3	*Escherichia coli: Proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Lower North Fork Clearwater TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	This is incorrect; E. coli is not proposed for delisting as bacteria levels in Long Meadow Creek are not within state standards (page 62) and a bacteria TMDL was completed for Long Meadow Creek (approved January 2003). This assessment unit is listed in Category 4a of the 2008 Integrated Report for E. coli.
231.	ID17060308CL034_03	3	*Sedimentation/Siltation: Proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Lower North Fork Clearwater TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	This is incorrect; sedimentation is not proposed for delisting as sediment levels are impairing water quality to the degree that beneficial uses are not being met (page 62-63) and a sediment TMDL was completed for Long Meadow Creek (approved January 2003). This assessment unit is listed in Category 4a of the 2008 Integrated Report for sediment.
232.	ID17060308CL034_03	3	*Temperature, water: Proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Lower North Fork Clearwater TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	This is incorrect; temperature is not proposed for delisting as continous temperature data indicate stream temperatures are above state standards for salmonid spawning and cold water biota (page 62) and a temperature TMDL was completed for Long Meadow Creek (approved January 2003). This assessment unit is listed in Category 4a of the 2008 Integrated Report for temperature.
233.	ID17060308CL034_03	3	*Nutrient/Eutrophication Biological Indicators: Proposed for delisting because wqs being met. Justification states that these are being removed as candidate cause in the Lower North Fork Clearwater TMDL, however the specific page is not cited. Need to know where in the document this information is located.*	The assessment database has been up-dated to reference the specific page(s) in the Lower NF Clearwater River Subbasin Assessment and TMDL.
234.	Basin Creek (Upper Salmon Sub basin) ID17060201SL048	4	*I have reviewed the draft 2008 Integrated Report, Section 5 on Impaired Waters. It appears that a few streams have been removed and a few added to the list. A new one that has been added is Basin Creek in the Upper Salmon sub basin. Our monitoring on Basin Creek is showing an improving trend for bank stability and depth fines.*	The SFI score for BURP Site 2001IDFA144 is skewed and not representative of the AU. The listing decision will be overturned to show full support.
235.	Challis Creek (Upper Salmon) ID17060201SL007_04 ID17060201SL009_03 ID17060201SL009 _04 Garden Creek	4	*Based on the data we have been collecting, these streams are either meeting Pacfish Standards for bank stability (>80%) or are trending upwards. Data for these streams on percent fine sediment at depth is also showing an improving trend.*	Challis Creek has an approved TMDL (approved by EPA in Jan 2003). This listing will be moved to section 4A of the integrated report. Garden Creek should be listed only for flow alterations (Upper Salmon SBA & TMDL, DEQ, 2003) rather than a pollutant which can be managed through land use practices. The Integrated Report will be

	ID17060201SL015_02 ID17060201SL015_03 ID17060201SL015_04			corrected accordingly.
236.	Pass Creek (Big Lost) ID17040218SK009_02	4	*Based on the data we have been collecting, these streams are either meeting Pacfish Standards for bank stability (>80%) or are trending upwards. Data for these streams on percent fine sediment at depth is also showing an improving trend.*	This AU represents the 2nd order tributaries of Pass Creek (Methodist, Bear and Mill Creeks) and only the upper most section of Pass Creek. During 5 year reviews of Big Lost TMDLs, these streams will be evaluated for delisting or TMDL development.
237.	Wet Creek (Little Lost Sub basin) ID17060217Sk023_03	4	*Based on the data we have been collecting, these streams are either meeting Pacfish Standards for bank stability (>80%) or are trending upwards. Data for these streams on percent fine sediment at depth is also showing an improving trend.*	Wet Creek has an approved TMDL (approved by EPA September 2000). The Integrated report will be modified and Wet Creek will be placed in category 4A.
238.	ID17050124SW007_05	5	*I was hoping to get some clarification of the upper segment of the Weiser River, specifically from what I can dig up it was: delisted in 1998 -listed in the 2002 Integrated Report; Section 5 Waterbodies for NUT and SED-not mentioned in the 2006 Weiser River TMDL-shown as fully supporting with no TMDL on the 305b status map from 2007-listed again in the new draft 2008 Integrated Report; Section 5 Waterbodies for SED/SILT and NUT/EUTR with a note that it was added on 3/27/2006. Is it listed? If so, can't figure out why it wasn't addressed in the Weiser River TMDL and why it doesn't show up on the 305b map.*	Your question (and understandable confusion) stems from a change in accounting systems. The integrated report, and all new TMDLs use 'Assessment Units', which are sections of water that share similar characteristics, and can therefore be assessed as one. The TMDL was written to an older system of 'Stream Segments'. The TMDL document makes a half-hearted attempt to provide a bridge between these two systems, but that bridge is plagued by typographic errors and omissions. Let's forget about the very upper reaches of the river for now, and just focus on the mainstem Weiser River downstream of the East Fork Weiser River. The old (stream segment) system broke the river into sections with the break points being 1. Galloway Dam, 2. Little Weiser River, 3. West Fork Weiser River The new (assessment unit) system breaks the river into sections, with the break points being 1. Crane Creek, 2. Keithly Creek, and 3. Hornet Creek. The assessment unit ID17050124SW007_05 (Weiser River between Keithly and Hornet Creeks) was listed in the 2002 Integrated Report,

				section 5, for Nutrients and Sediment. It was also addressed in the TMDL, but was bisected by the Little Weiser River: it is included in the upper part of the 'Galloway Dam to Little Weiser River' segment and the lower part of the 'Little Weiser River to West Fork' segment. To further complicate things, and to avoid future obfuscation, these two systems must be reconciled for the integrated report. DEQ will achieve this by splitting the assessment units to match the older stream-segment boundaries. That will result in a system of break points that captures both accounting methods; the break points will be: 1.Galloway, 2.Crane Creek, 3. Keithly Creek, 4.Little Weiser River, 5. Hornet Creek, and 6. West Fork. This splitting of assessment units is fairly easy, and we will try to complete it before the final Integrated Report is submitted. If we are unable to finish the assessment by that time, it will be done in time for the next Integrated Reporting cycle. I apologise for the lengthy response, but hope it clarifies why DEQ is having problems with this assessment. It represents a combination of every possible problem with an assessment unit, and, thankfully, is very rare. It will be fixed by the next cycle. Leaving the bean-counting aside, on the ground (which is where all this really matters, anyway), there is a TMDL in place for sediment and nutrients for the Weiser River between its mouth and the Little Weiser River. There is a TMDL in place for bacteria between the mouth and Galloway dam, and there is a TMDL in place for temperature between the mouth and the West Fork Weiser River. Hawk Stone DEQ Boise Region
239.	ID17010214PN048_03a	6	*This unit is listed under category 3 in the draft 305(b) report. This does not seem entirely inappropriate, but the description of this section causes some concern for me. I would like to see some assurance that this portion of the watershed is addressed as soon as possible. It should be high priority due to its location relative to the City of Sandpoint. It receives a good portion of the storm water runoff from the City of Sandpoint, has many residences and commercial businesses adjacent to it (restaurants,*	Listing this assessment unit in section 3 of the Draft 2008 Integrated Report is an error. A sediment TMDL was developed for this assessment unit in 2007 – The Pend Oreille Tributaries Sediment TMDLs (page ES-9 and 81). The assessment unit/pollutant (sediment) combination will be moved to section 4a of the Integrated Report. Additional monitoring will be conducted on the segment of stream in question to better identify any other possible pollutants impairing beneficial uses. Results of the additional monitoring will be incorporated into the subbasins five-year TMDL review.

			marinas, etc), and comprises half of the swimming area for Sandpoint's City Beach. In addition, the Idaho Transportation Department's Highway 95 byway project will be directly impacting the riparian vegetation throughout this section of the creek. There should be some baseline information in place prior to implementation of this project in order to monitor any water quality effects. If there is no data available, how can IDEQ certify the project under section 401 of the Clean Water Act?	DEQ is responsible for determining if a proposed federally permitted project is in compliance with Idaho WQS under section 401 of the Clean Water Act. Certification conditions may be added to ensure compliance. To determine compliance during construction, water quality downstream of the activity is compared with water quality upstream of the activity. Additional monitoring and modeling was required prior to the issuance of the Sand Creek Byway certification.
240.	Boise River	7	*The Department of Environmental Quality's (DEQ) own subbasin assessment published in December 2001 indicates the Boise River designated uses are not impaired by nutrients. Phosphorus loading reductions to the Snake River may be required the meet the Snake River - Hells Canyon TMDL.*	Thank you for your comment. Allocations for the Boise River to meet the SRHC TMDL has been prepared.
241.	Boise River	7	*Temperature listing on the Boise River main stem and tributaries: The primary cause of temperature impairment is natural causes, i.e., solar warming. Southwest Idaho is classified as a desert. EPA listed the Boise River main stem for temperature in 2001. The point sources should not be held liable for the impacts of natural solar warming on the receiving waters.*	It is DEQ's opinion that the majority of thermal loading in the lower Boise River is from atmospheric conditions. With that in mind, DEQ may be developing a temperature TMDL in the future. We are also not currently aware of effluent limits for temperature in municipal NPDES permits.
242.	Indian Creek	7	*Indian Creek is listed for temperature in Section 5 of the Draft. The Nampa WWTP has sampled and tested Indian Creek upstream of the treatment plant on a regular basis for over twenty years. Parameters tested for include: flow, temperature, dissolved oxygen, BOD, TSS, pH, NH3-N, TKN, fecal coliforms, and total phosphorus. These analytical results are available upon request.*	It is DEQ's opinion that the majority of thermal loading in Indian Creek is from atmospheric conditions. With that in mind, DEQ may be developing a temperature TMDL in the future. We are also not currently aware of effluent limits for temperature in municipal NPDES permits.
243.	Indian Creek	7	*Indian Creek has been sampled and tested for fecal coliforms both upstream and downstream of the treatment plant regularly for over twenty years. The net result of the testing is a consistent reduction in the fecal coliform counts in the downstream sample when compared with the upstream sample. The implication is there are sources of fecal coliforms upstream of the*	Thank you for the comment. However, be advised that Idaho WQS for bacteria are currently based on E. coli rather than fecal coliform.

			treatment plant. There appears to be a dilution effect when Nampa's effluent is mixed with Indian Creek.	
244.	Indian Creek	7	*Indian Creek (all orders): Sedimentation and siltation in Indian Creek is likely due to various point and nonpoint sources. Indian Creek flows through agricultural lands which contribute sediment and silts during irrigation periods and storm events. Urban storm water runoffs impact Indian Creek as it flows though Nampa. DEQ's subbasin assessment published in December 2001 indicates Indian Creek is not impaired for its designated beneficial uses and should be delisted for nutrients and oil and grease. Nampa urges DEQ to delist Indian Creek for nutrients and oil and grease.*	Based on data available prior to 2001, it was DEQ's opinion that Indian Creek should be delisted for nutrients and oil & grease. Also, this opinion was based on the uses proposed in a use attainability analysis (UAA) prepared by an independent contractor. The EPA did not approve these changes and recommended that the agency or the Watershed Advisory Group (WAG) split Indian Creek into assessment units (AU) with additional information provided to support delisting by AU.
245.	Mason Creek	7	*Sedimentation and siltation in Mason Creek is likely due to various point and nonpoint sources. Mason Creek flow through agricultural lands which contribute sediment and silts during irrigation periods and storm events. Urban storm water runoffs impacts Mason Creek as it flows through Nampa. DEQ's subbasin assessment published in December 2001 indicates Mason Creek, although not use designated, is not unpaired for its presumed designated beneficial use and should be delisted for nutrients, sediment, and dissolved oxygen. Nampa urges DEQ to deist Mason Creek for nutrients, sediment, and dissolved oxygen.*	Based on data available prior to 2001, it was DEQ's opinion that Mason Creek should be delisted for nutrients, sediment and DO. Also, this opinion was based on the uses proposed in a use attainability analysis (UAA) prepared by an independent contractor. The EPA did not approve these changes and recommended that the agency or the Watershed WAG split Mason Creek into AUs with additional information provided to support delisting by AU.
246.	ID17050108SW018_02	8	*The draft 2008 Integrated Water Quality Monitoring and Assessment Report continues to list Louse Creek (17050108 Jordan) as impaired for Sedimentation/Siltation, pH, and Metals. However, the Draft Jordan Creek Sub basin Assessment and Total Maximum Daily Load (April 16, 2007) document recommends removal of Louse Creek from the 303(d) list. We are not aware of any data that supported the original listing of Louse Creek in the state's 303(d) list. However, more recent data and information collected by IDEQ demonstrates that listing Louse Creek as impaired in not*	This comment pertains only to the upper parts (1st and 2nd order) of Louse Creek. DEQ is currently waiting for the Jordan Creek TMDL to be approved. Usually we wait until approval before updating the 303(d) list. However, there is no reason why we could not update the 303(d) list before approval, providing we can cite appropriate data. The TMDL document provides a strong argument to delist Louse Creek, and so we will do so. Be aware that we may have to wait for approval of the TMDL.

			appropriate. This fact is summarized in the TMDL Executive Summary, pg. xxx, Table K., Recommended Changes to 303(d) List column for Louse Creek which states: "Remove water body from 303(d) list. The supporting justification states: "Assessment showed full support, no numeric criteria for pH or metals exceeded." In addition, more detailed data interpretation and discussion regarding removal of Louse Creek from the 303(d) list is in the body of the Draft TMDL document on pages 76-86. Page 78, paragraph 7, includes the statement: "It was concluded, in both the final assessments for 1996 and 2003, metals were not impairing the expected macro-invertebrate community structure in Louse Creek." Further, page 79 includes the statement: "Overall, the examination of available macro-invertebrate information would indicate conditions support expected community structure and diversity." Based on IDEQ's own findings and data, removal of Louse Creek from the 303(d) list is warranted. Therefore we propose delisting Louse Creek in the 2008 Integrated Report currently under review. As you may be aware, the listing of a water body on the state's 303(d) list can have significant regulatory implications for purposes of NPDES Permit coverage and other issues. It is therefore important for IDEQ to remove waters that are not appropriately listed. This action will ensure that Louse Creek is correctly classified as unimpaired and correctly regulated by both IDEQ and EPA.	
247.	ID17050108SW018_03	8	*The draft 2008 Integrated Water Quality Monitoring and Assessment Report continues to list Louse Creek (17050108 Jordan) as impaired for Sedimentation/Siltation, pH, and Metals. However, the Draft Jordan Creek Sub basin Assessment and Total Maximum Daily Load (April 16, 2007) document recommends removal of Louse Creek from the 303(d) list. We are not aware of any data that supported the original listing of Louse Creek in the state's 303(d) list. However, more recent data and information collected by IDEQ demonstrates that listing Louse Creek as impaired in not appropriate. This fact is summarized in the TMDL*	The third order section of Louse Creek is not listed. It is fully supporting its beneficial uses.

			Executive Summary, pg. xxx, Table K., Recommended Changes to 303(d) List column for Louse Creek which states: "Remove water body from 303(d) list. The supporting justification states: "Assessment showed full support, no numeric criteria for pH or metals exceeded." In addition, more detailed data interpretation and discussion regarding removal of Louse Creek from the 303(d) list is in the body of the Draft TMDL document on pages 76-86. Page 78, paragraph 7, includes the statement: "It was concluded, in both the final assessments for 1996 and 2003, metals were not impairing the expected macro-invertebrate community structure in Louse Creek." Further, page 79 includes the statement: "Overall, the examination of available macro-invertebrate information would indicate conditions support expected community structure and diversity." Based on IDEQ's own findings and data, removal of Louse Creek from the 303(d) list is warranted. Therefore we propose delisting Louse Creek in the 2008 Integrated Report currently under review. As you may be aware, the listing of a water body on the state's 303(d) list can have significant regulatory implications for purposes of NPDES Permit coverage and other issues. It is therefore important for IDEQ to remove waters that are not appropriately listed. This action will ensure that Louse Creek is correctly classified as unimpaired and correctly regulated by both IDEQ and EPA.	
248.	Louse Creek ID17050108 (Jordan)	8	*The draft 2008 Integrated Water Quality Monitoring and Assessment Report continues to list Louse Creek (17050108 Jordan) as impaired for Sedimentation/Siltation, pH, and Metals. However, the Draft Jordan Creek Sub basin Assessment and Total Maximum Daily Load (April 16, 2007) document recommends removal of Louse Creek from the 303(d) list. We are not aware of any data that supported the original listing of Louse Creek in the state's 303(d) list. However, more recent data and information collected by IDEQ demonstrates that listing Louse Creek as impaired in not appropriate. This fact is summarized in the TMDL Executive Summary, pg. xxx, Table K.,*	Please see AU-specific comments in IDASA: ID17050108SW018_02 and 018_03

			Recommended Changes to 303(d) List column for Louse Creek which states: "Remove water body from 303(d) list. The supporting justification states: "Assessment showed full support, no numeric criteria for pH or metals exceeded." In addition, more detailed data interpretation and discussion regarding removal of Louse Creek from the 303(d) list is in the body of the Draft TMDL document on pages 76-86. Page 78, paragraph 7, includes the statement: "It was concluded, in both the final assessments for 1996 and 2003, metals were not impairing the expected macro-invertebrate community structure in Louse Creek." Further, page 79 includes the statement: "Overall, the examination of available macro-invertebrate information would indicate conditions support expected community structure and diversity." Based on IDEQ's own findings and data, removal of Louse Creek from the 303(d) list is warranted. Therefore we propose delisting Louse Creek in the 2008 Integrated Report currently under review. As you may be aware, the listing of a water body on the state's 303(d) list can have significant regulatory implications for purposes of NPDES Permit coverage and other issues. It is therefore important for IDEQ to remove waters that are not appropriately listed. This action will ensure that Louse Creek is correctly classified as unimpaired and correctly regulated by both IDEQ and EPA.	
249.		9	*EPA Region 10 listed the main stem for temperature (EPA 2001). However, DEQ concluded in the Lower Boise TMDL (DEQ 2000) that temperature exceedances were due primarily to solar warming rather than to discharges and that a temperature TMDL is not warranted for the mains tem river. As a result, temperature impairment is not due to a "pollutant" but rather to "pollution" and therefore these segments should be identified in Section 4c as related to temperature.*	It is DEQ's opinion that the majority of thermal loading in the lower Boise River is from atmospheric conditions. With that in mind, DEQ may be developing a temperature TMDL in the future.
250.	Blacks Creek (1st,	9	*Should be delisted from Section 5 (DEQ 2001d).*	Based on data available prior to 2001, it was DEQ's opinion that Blacks

	2nd and 3rd order)		*Although DEQ has stated that "a large portion of [intermittent waters] are unassessed and can be found in Section 3", this waterbody has undergone more extensive study than others with limited or no BURP data. Thus, it should be placed in Section 2.*	Creek should be delisted for unknown pollutants. Also, this opinion was based on the uses proposed in a use attainability analysis (UAA) prepared by an independent contractor. The EPA did not approve these changes.
251.	Boise River	9	*The LBWC supports DEQ's decision to remove nutrient impairment from the list of parameters applicable to the main stem river in the draft 2008 report. DEQ's subbasin assessment (SBA) for the main stem Boise River concluded that uses in the main stem were not impaired by nutrients and the river should be delisted for this parameter (DEQ 2001a). It is recognized that the Snake River-Hells Canyon (SR-HC) TMDL (DEQ 2001e), which has been finalized by DEQ and approved by EPA, requires reductions in phosphorus at the mouth of the Boise River to improve water quality conditions in the Snake River. The LBWC is currently working with DEQ and EPA to develop phosphorus allocations for the Boise River in response to the SR-HC. We believe that the factual basis and analyses done by DEQ for the SBA are sound. In addition, the City of Boise has analyzed more recent water quality data for the main stem river that have been collected by USGS since completion of the SBA. These data demonstrate that the dissolved oxygen concentrations at all monitoring stations remain in compliance with the applicable standards of 6 mg/L and 75 percent saturation.*	Thank you for your comment. An Implementation Plan that includes allocations for the Boise River to meet the Snake River Hells Canyon (SRHC) TMDL has been prepared.
252.	Fivemile Creek (1st and 2nd order)	9	*While bacteria have been added to the downstream segment [DEQ 2001b], these two segments are hydrologically disconnected and there are no data to indicate impairment from bacteria in the upstream reach. Although DEQ has stated that "a large portion of [intermittent waters] are unassessed and can be found in Section 3", this waterbody has undergone more extensive study than others with limited or no BURP data. Thus, it should be placed in Section 2.*	Based on data available prior to 2001, it was DEQ's opinion that upper Fivemile Creek was intermittent and should be placed in a modified use category. Also, this opinion was based on the uses proposed in a use attainability analysis (UAA) prepared by an independent contractor. The EPA did not approve these changes and recommended that the agency or the Watershed WAG split Five Mile Creek into AUs with additional information provided to support delisting by AU..
253.	Fivemile Creek (3rd order)	9	*Suspected nutrient impairment is still listed for this segment. The DEQ SBA (DEQ, 2001b) concluded that*	Based on data available prior to 2001, it was DEQ's opinion that lower Fivemile Creek should be delisted for nutrients. Also, this opinion was

			this segment should be delisted for nutrients.	based on the uses proposed in a use attainability analysis (UAA) prepared by an independent contractor. The EPA did not approve these changes and recommended that the agency or the Watershed WAG split Five Mile Creek into AUs with additional information provided to support delisting by AU..
254.	Indian Creek	9	*The draft 2008 report includes Indian Creek (1st, 2nd and 3rd order) for nutrient and sediment/siltation impairment, all added on 3/27/2006. The SBA for Indian Creek (DEQ, 2001b) concluded that it should be delisted for nutrients and sediment.*	Based on data available prior to 2001, it was DEQ's opinion that Indian Creek should be delisted for nutrients and sediment (Indian Creek could have a sediment TMDL developed after implementation of the Lower Boise River sediment TMDL). Also, this opinion was based on the uses proposed in a use attainability analysis (UAA) prepared by an independent contractor. The EPA did not approve these changes and recommended that the agency or the Watershed WAG split Indian Creek into AUs with additional information provided to support delisting by AU..
255.	Langley/Grave-yard Gulch complex	9	*This belongs in the Lower Payette HUC.*	You are correct. Langley and Graveyard Gulches are in the lower Payette watershed. They are in assessment unit ID17050122SW001_02. The name of the assessment unit you refer to was incorrect and will be changed.
256.	Main stem Boise River (Lucky Peak to Diversion Dam)	9	*This segment is listed for flow alteration only, and thus should be removed from Section 5 and included only in Section 4c.*	Agreed.
257.	Mason Creek	9	*Suspected nutrient impairment is still listed for Mason Creek. DEQ's SBA (DEQ, 2001c) concluded that Mason Creek should be delisted for nutrients.*	Based on data available prior to 2001, it was DEQ's opinion that Mason Creek should be delisted for nutrients. Also, this opinion was based on the uses proposed in a use attainability analysis (UAA) prepared by an independent contractor. The EPA did not approve these changes.
258.	Stewart Gulch, Cottonwood and Crane Creeks	9	*Should be moved from Section 5 to Section 3 because data for Cottonwood Creek consist of three BURP reports obtained during June of 1996 and 1997. These BURP stations are located within the upper part of the watershed that is intermittent (USGS Gage 13204640). Low macro-invertebrates populations resulted in low metric scores (MBI and SBI both in "Not Full Support" category). However, during spring runoff periods the seasonal macro-invertebrate communities are not yet well established and robust macro-invertebrate scores would not be expected. Finally, the Final WBAG (Grafe et al. 2002) indicates that aquatic community indexes should not apply to undesignated intermittent*	Thank you for the comments. 1) Cottonwood Creek is conjoined into one assessment unit with Stewart Gulch and Crane Creek because all three creeks are similar in terms of land use, location, and size. Hence, what happens to Cottonwood, also happens to Stewart and Crane. Splitting them off is a possibility, but the force for doing so must spring from a real-world difference between the creeks, such as one flowing through forest while the other is irrigated. Maps do not show much difference, and combining them into one AU seems to be appropriate. 2) This assessment unit was listed based on BURP data. You are correct in noting that if these sites were to be assessed today, the aquatic community indices would not apply, because the streams are intermittent. However, these sites were assessed using an older equivalent of

			waterbodies. According to the limited USGS gage data (13204640), the upper reaches of Cottonwood Creek go dry for at least two months each summer. Thus, the existing biological data appear lower (possibly perennial) reaches of this waterbody, then this creek should be divided into separate reaches and assessed independently. In addition, no data are available for Stewart Gulch and Crane Creek, so they should be split into a different Assessment Unit to be insufficient to support an attainment determination and this waterbody should be placed in Section 3 (EPA 2002b). If future BURP data are collected in the lower (possibly perennial) reaches of this waterbody, then this creek should be divided into separate reaches and assessed independently. In addition, no data are available for Stewart Gulch and Crane Creek, so they should be split into a different Assessment Unit.	'WBAG', which had no such prohibition on assessing intermittent streams. 3) Cottonwood Creek was listed on the 1998 303(d) list. So much time has passed that the rationale for delisting will have to be better than 'does not conform to current assessment standards'. We will require data that show that the stream meets WQS when it flows.
259.	Tenmile Creek (3rd order below Blacks Creek Reservoir)	9	*Tenmile Creek (3rd order below Blacks Creek Reservoir) has been delisted in the draft 2008 report for dissolved oxygen and sedimentation/siltation based on the SBA for Fivemile and Tenmile Creeks. LBWC participated closely with DEQ on the SBA and supports these conclusions and delistings. Suspected nutrient impairment is still listed for this segment. The DEQ SBA (DEQ, 2001b) concluded that this segment should be delisted for nutrients.*	Based on data available prior to 2001, it was DEQ's opinion that Tenmile Creek should be delisted for nutrients. Also, this opinion was based on the uses proposed in a use attainability analysis (UAA) prepared by an independent contractor. The EPA did not approve these changes.
260.	Black Canyon Reservoir (Payette)	10	*I believe there is a sediment problem above Black Canyon reservoir in the Payette and I propose that the monitoring station at the Montour Bridge is the wrong place for determining sediment compliance. I would suggest upstream from the reservoir maybe 0.5 miles and a visual observation will show a significant movement of sediment along the river bed.*	A suspended sediment TMDL was prepared to address the effects of bedload sediment entering the Cascade Reservoir to Clear Creek reach. Sediment would be expected to accumulate in the slack water of a reservoir. However, DEQ will investigate your suggestion with access to this area being a consideration.
261.	Lower Boise	10	*The Lower Boise should not be delisted for nutrients as proposed in the delisted segments. Management of nutrients on all streams is vital if the TMDL for Brownlee is to be successful. I believe there are macrophytes in the lower Boise and they cause violations of water quality standards. Excessive*	Thank you for your comment. DEQ does intend to delist the Lower Boise River for nutrients. DEQ does intend to delist the Lower Boise River for nutrients. An Implementation Plan that includes allocations for the Boise River to meet the SRHC TMDL has been prepared.

			macrophytes can cause dissolved oxygen violation usually in the early morning hours as part of the oxygen sag. Macrophyte growths create violations of water quality standards because they interfere with beneficial uses such as swimming, boating and fishing.	
262.	Mann's Creek Reservoir	10	*There was a significant blue green algae bloom this year in Mann's Creek Reservoir. Local fishermen said there was an article in the local paper advising people to not let their pets drink the water. Blooms like this can have a negative impact on the city of Weiser's drinking water treatment plant.*	We have noted your comment and will investigate Mann Creek Reservoir as resources allow.
263.	Middle Snake (above CJ Strike)	10	*There are several streams proposed for delisting in the middle Snake above CJ strike for sediment for several reasons (pages 76-84), however I believe the reasons given are invalid because there are significant sediment deposits at the mouth of these streams where they empty in to the Snake. I think visual observations mean a lot more in this case than information gained from a field sampling trip. If there is sediment in the mouth of these streams or in the Snake, I suggest there is a sediment problem and a TMDL needs to be developed. In other words, it is wrong to delist these streams because water quality is not being met.*	DEQ respectfully disagrees. The only streams proposed for delisting above the C. J. Strike Subbasin in the Middle Snake River include the following: (1) Ellison Creek, (2) Vinyard Creek and (3) Alpheus Creek as discussed in the Upper Snake Rock TMDL (2000). However, their delisting does not imply or suggest that existing water quality conditions may be degraded below their WQS or beneficial uses as defined in the TMDL. In fact, the Upper Snake Rock TMDL Modification (2005) lists these streams as informational TMDLs with appropriate instream targets for TP (0.020 mg/L) and TSS (1.3 mg/L) at p 48 for Ellison Creek, p 47 for Alpheus Creek and p 39 for Vinyard Creek. In addition, there are other similar informational TMDLs that are included in the TMDL Modification document; and these are (1) Devils Corral Spring (p 39), (2) Banbury Springs (p 58), (3) Box Canyon (p 59) and (4) Blue Heart Springs (p 60) at similar instream water quality targets for TP and TSS. The TMDL Modification document also generally describes these 7 tributaries (p 26) as springs and seeps; and essentially supports the Upper Snake Rock TMDL (2000) as part of the antidegradation provision for the protection of their beneficial uses at existing water quality conditions as defined in the TMDL Modification document. Therefore, delisting of these streams does not imply degradation of water quality in excess of their existing conditions for the protection of their beneficial uses and WQS. They must be maintained at these water quality levels in order for the Middle Snake River to meet its beneficial uses and WQS as part of the TMDL effort to cleanup the Middle Snake River. The sediment problem referred to in these streams, however, is not due to excess sediment coming from the streams themselves. Rather, it is a cumulative condition brought on by (1) the talus sands that are naturally spewed by the springs associated with the Eastern Snake River Plain Aquifer (of which these 7 tributaries are associated on the north side of the river) and

				(2) any channel sediments upstream of their confluence with the Snake River that are being transported downstream which are accumulated in confluence areas of these springfed systems as well as other tributaries. The amount of actual sediment from nonpoint sources that is coming from these springfed systems (independent of the talus sands) is not significant when compared to that of other nonpoint source driven tributaries in the Upper Snake Rock Subbasin. Finally, DEQ is currently revisiting these 7 tributaries as part of the 5 year assessment process for the TMDL review and will be collecting instream data to assess present conditions. DEQ is also meeting with the designated land management agencies that are associated with these and other tributaries to assess implementation projects that are associated with water quality cleanup efforts in order to meet TMDL standards.
264.	Paddock Reservoir	10	*Paddock reservoir had a significant green algae bloom late last summer that most likely caused a dissolved oxygen water quality violation standards violation. I observed some limited blue green algae populations.*	We have noted your comment and will investigate Paddock Reservoir as resources allow.
265.	Snake River (above and below Swan Falls and above CJ Strike)	10	*The macrophyte population continues to expand in the Snake River above and below Swan falls and in the Snake River arm above Strike reservoir. Beneficial uses are being impacted and will continue to be impacted. DEQ needs to develop rules and guidance to address this problem as it is only going to get worse.*	A nutrient TMDL was approved by the EPA in January 2004.
266.	Weiser River (below Crane Creek Reservoir)	10	*In another section of this draft report there is some discussion on the Weiser River below Crane Creek reservoir with respect to TMDL's, I offer that there is a significant macrophyte growth in the lower Weiser in particular above the Galloway diversion dam. This section of the river does not meet water quality standards because beneficial uses are not being met with respect to swimming, boating and fishing.*	Phosphorus allocations were included in the Weiser River TMDL approved by the EPA in January 2007.
267.	ID16010201BR010_02d	11	*The AU was proposed for delisting in the Bear River/Malad River Subbasin Assessment and TMDL Plan (March 2006). It is not mentioned in the Draft 2008 Integrated Report but shows up on the GIS coverage as not supporting CWAL. Both the GIS layer and report should list this AU as supporting.*	North Creek was listed prior to the Bear River/Malad Subbasin TMDL (approved by EPA June 2006) being prepared. This AU was addressed in the TMDL. A sediment target applies to this AU as part of the TMDL. This AU supports beneficial use; however, in order for the TMDL to apply, it will remain in Category 4a for this Integrated Report. AUs that support beneficial uses and are not negatively affecting water quality (and therefore beneficial uses) in downstream receiving waters

				will be moved to Category 2 in ensuing reporting cycles. Mladenka 6-27-08
268.	ID16010201BR016_03b	11	*The 2006 Bear River Basin/Malad River Subbasin Assessment and TMDL states that "Data indicate North, St. Charles and Maple Creeks are meeting their beneficial uses for cold water aquatic life." The AU is found no where in the Draft 2008 Integrated Report; however, it shows as not supporting CWAL on the GIS coverage. These should be included in the 2008 Integrated Report.*	This has been corrected. This AU should be in section 2 (full support) of the Draft 2008 Integrated Report. The GIS coverage will now show full support for this AU.
269.	ID17040204SK026_04	11	*The 2002/2003 Integrated Report listed this AU in Section 4a (TMDL). However, these TMDLS are not identified in the draft 2008. Recommend re-establishing the connection to the TMDL by placing this AU in Section 4a of the 2008 Integrated Report.*	Agree, only the 4a listing from approved TMDL is indicated.
270.	ID17040204SK042_02	11	*The 2002/2003 Integrated Report listed this AU in Section 4a (TMDL). However, these TMDLS are not identified in the draft 2008. Recommend re-establishing the connection to the TMDL by placing this AU in Section 4a of the 2008 Integrated Report.*	AU has been updated to reflect approved TMDL
271.	ID17040204SK045_02	11	*The 2002/2003 Integrated Report listed this AU in Section 4a (TMDL). However, these TMDLS are not identified in the draft 2008. Recommend re-establishing the connection to the TMDL by placing this AU in Section 4a of the 2008 Integrated Report.*	This AU resides in category 4a
272.	ID17040207SK018_02a	11	*Our data shows depth fines and bank stability are meeting the TMDL criteria developed in the 2002 Blackfoot Subbasin TMDL Assessment and should be delisted from section 4a.*	DEQ 2002 BURP data show a failure to meet beneficial use support criteria. This AU was included in the Blackfoot River TMDL (accepted April 2002). A sediment target applies to this AU as part of the TMDL therefore, in order for the TMDL to apply, it will remain in Section 4a. This stream has an existing TMDL and therefore will remain in section 4a until further DEQ BURP assessments determing that it meets our beneficial use criteria.
273.	ID17040207SK018_02b	11	*This AU is listed in Section 4a (EPA approved TMDL). TMDLs from the 2002 Blackfoot Subbasin Assessment & TMDL were applied to this AU when no beneficial use impairment was reported in the Subbasin Assessment, 2002/2003 Integrated Report, or additional data. It is recommended to remove this unit from Section 4a and place in the appropriate section.*	This AU was included in the Blackfoot River TMDL (accepted April 2002). A sediment target applies to this AU as part of the TMDL therefore, in order for the TMDL to apply, it will remain in Section 4a.

274.	ID17040207SK018_02d	11	*This AU is listed in Section 4a (EPA approved TMDL). TMDLs from the 2002 Blackfoot Subbasin Assessment & TMDL were applied to this AU when no beneficial use impairment was reported in the Subbasin Assessment, 2002/2003 Integrated Report, or additional data. It is recommended to remove this unit from Section 4a and place in the appropriate section.*	This AU was included in the Blackfoot River TMDL (accepted April 2002). A sediment target applies to this AU as part of the TMDL therefore, in order for the TMDL to apply, it will remain in Section 4a.
275.	ID17040207SK022_02	11	*This AU is listed in Section 4a (EPA approved TMDL). TMDLs from the 2002 Blackfoot Subbasin Assessment & TMDL were applied to this AU when no beneficial use impairment was reported in the Subbasin Assessment, 2002/2003 Integrated Report Additional data does show that this AU should be listed in Section 5 (§303(d)) of the report.*	This AU was included in the Blackfoot River TMDL (accepted April 2002). A sediment target applies to this AU as part of the TMDL therefore, in order for the TMDL to apply, it will remain in Section 4a.
276.	ID17040207SK022_03a	11	*This AU is listed in Section 4a (EPA approved TMDL). TMDLs from the 2002 Blackfoot Subbasin Assessment & TMDL were applied to this AU when no beneficial use impairment was reported in the Subbasin Assessment, 2002/2003 Integrated Report Additional data does show that this AU should be listed in Section 5 (§303(d)) of the report.*	This AU was included in the Blackfoot River TMDL (accepted April 2002). A sediment target applies to this AU as part of the TMDL therefore, in order for the TMDL to apply, it will remain in Section 4a.
277.	ID17040208SK003_02a	11	*This AU is listed in Section 4a as having an EPA approved sediment TMDL. The 2002/ 2003 Integrated Report shows that sediment was not impairing beneficial uses. The 2001 Portneuf TMDL was applied to several AUs that are not impaired by this pollutant. Also stated in the 2001 TMDL indicated delisting of Pebble Creek, "Information collected through the Beneficial Use Reconnaissance Program indicates that several streams on the 303(d) list (Gibson Jack, Mink, Walker, Bell Marsh, Goodenough, upper Garden, Dempsey, Pebble, and Toponce Creeks) are supporting their beneficial uses; it is recommended that these streams be removed from the 303(d) list."*	Gibson Jack Creek was listed prior to the Portneuf TMDL (approved 4-18-2001) being prepared. This AU was included in the Portneuf River TMDL (accepted 4-16-2001). A sediment target applies to this AU as part of the TMDL. This AU supports beneficial use; however, in order for the TMDL to apply, it will remain in Category 4a for this Integrated Report. AUs that meet or continue to support beneficial uses and are not negatively affecting water quality and therefore beneficial uses in downstream receiving waters will be moved to Category 2 in ensuing reporting cycles. Mladenka 3-24-08
278.	ID17040208SK004_02c	11	*This AU is listed in Section 4a (EPA approved TMDL). TMDLs from the 2001 Portneuf Subbasin Assessment & TMDL were applied to this AU when no beneficial use impairment was reported in the Subbasin Assessment, 2002/2003 Integrated Report, or additional data. It is recommended to remove this unit from Section 4a and place in the appropriate section.*	Mink Creek was listed prior to the Portneuf TMDL (approved 4-18-2001) being prepared. This AU was included in the Portneuf River TMDL (accepted 4-16-2001). Nutrient and sediment targets apply to this AU as part of the TMDL. This AU supports beneficial use; however, in order for the TMDL to apply, it will remain in Category 4a for this Integrated Report. AUs that meet or continue to support beneficial uses and are not negatively affecting water quality and therefore beneficial

				uses in downstream receiving waters will be moved to Category 2 in ensuing reporting cycles. Mladenka 3-24-08
279.	ID17040208SK004_02d	11	*This AU is listed in Section 4a (EPA approved TMDL). TMDLs from the 2001 Portneuf Subbasin Assessment & TMDL were applied to this AU when no beneficial use impairment was reported in the Subbasin Assessment, 2002/2003 Integrated Report, or additional data. It is recommended to remove this unit from Section 4a and place in the appropriate section.*	Mink Creek was listed prior to the Portneuf TMDL (approved 4-18-2001) being prepared. This AU was included in the Portneuf River TMDL (accepted 4-16-2001). Nutrient and sediment targets apply to this AU as part of the TMDL. This AU supports beneficial use; however, in order for the TMDL to apply, it will remain in Category 4a for this Integrated Report. AUs that meet or continue to support beneficial uses and are not negatively affecting water quality and therefore beneficial uses in downstream receiving waters will be moved to Category 2 in ensuing reporting cycles. Mladenka 3-24-08
280.	ID17040208SK004_04a	11	*This AU is listed in Section 4a (EPA approved TMDL). TMDLs from the 2001 Portneuf Subbasin Assessment & TMDL were applied to this AU when no beneficial use impairment was reported in the Subbasin Assessment, 2002/2003 Integrated Report, or additional data. It is recommended to remove this unit from Section 4a and place in the appropriate section.*	Mink Creek was listed prior to the Portneuf TMDL (approved 4-18-2001) being prepared. This AU was included in the Portneuf River TMDL (accepted 4-16-2001). Nutrient and sediment targets apply to this AU as part of the TMDL. This AU supports beneficial use; however, in order for the TMDL to apply, it will remain in Category 4a for this Integrated Report. AUs that meet or continue to support beneficial uses and are not negatively affecting water quality and therefore beneficial uses in downstream receiving waters will be moved to Category 2 in ensuing reporting cycles. Mladenka 3-24-08
281.	ID17040208SK007_02a	11	*This AU is listed in Section 4a (EPA approved TMDL) as having a sediment TMDL. The 2002/2003 Integrated Report shows that sediment was not impairing beneficial uses. The 2001 Portneuf TMDL was applied to several AUs that are not impaired by this pollutant. Also stated in the 2001 TMDL indicated delisting of Pebble Creek, "Information collected through the Beneficial Use Reconnaissance Program indicates that several streams on the 303(d) list (Gibson Jack, Mink, Walker, Bell Marsh, Goodenough, upper Garden, Dempsey, Pebble, and Toponce Creeks) are supporting their beneficial uses; it is recommended that these streams be removed from the 303(d) list."*	Walker Creek was listed prior to the Portneuf TMDL (approved 4-18-2001) being prepared. This AU was included in the Portneuf River TMDL (accepted 4-16-2001). A sediment target applies to this AU as part of the TMDL. This AU supports beneficial use; however, in order for the TMDL to apply, it will remain in Category 4a for this Integrated Report. AUs that support beneficial uses and are not negatively affecting water quality (and therefore beneficial uses) in downstream receiving waters will be moved to Category 2 in ensuing reporting cycles. Mladenka 3-24-08
282.	ID17040208SK008_02a	11	*This AU is listed in Section 4a (EPA approved TMDL). TMDLs from the 2001 Portneuf Subbasin Assessment & TMDL were applied to this AU when no beneficial use*	Bell Marsh Creek was listed prior to the Portneuf TMDL (approved 4-18-2001) being prepared. This AU was included in the Portneuf River TMDL (accepted 4-16-2001). Nutrient and sediment targets apply to this

			impairment was reported in the Subbasin Assessment, 2002/2003 Integrated Report, or additional data. It is recommended to remove this unit from Section 4a and place in the appropriate section.	AU as part of the TMDL. This AU supports beneficial use; however, in order for the TMDL to apply, it will remain in Category 4a for this Integrated Report. AUs that meet or continue to support beneficial uses and are not negatively affecting water quality and therefore beneficial uses in downstream receiving waters will be moved to Category 2 in ensuing reporting cycles. Mladenka 3-24-08
283.	ID17040208SK009_02b	11	*This AU is listed in Section 4a as having an EPA approved sediment TMDL. The 2002/ 2003 Integrated Report shows that sediment was not impairing beneficial uses. The 2001 Portneuf TMDL was applied to several AUs that are not impaired by this pollutant. Also stated in the 2001 TMDL indicated delisting of Pebble Creek, "Information collected through the Beneficial Use Reconnaissance Program indicates that several streams on the 303(d) list (Gibson Jack, Mink, Walker, Bell Marsh, Goodenough, upper Garden, Dempsey, Pebble, and Toponce Creeks) are supporting their beneficial uses; it is recommended that these streams be removed from the 303(d) list."*	Goodenough Creek was listed prior to the Portneuf TMDL (approved 4-18-2001) being prepared. This AU was included in the Portneuf River TMDL (accepted 4-16-2001). A sediment target applies to this AU as part of the TMDL. This AU supports beneficial use; however, in order for the TMDL to apply, it will remain in Category 4a for this Integrated Report. AUs that support beneficial uses and are not negatively affecting water quality (and therefore beneficial uses) in downstream receiving waters will be moved to Category 2 in ensuing reporting cycles. Mladenka 3-2008.
284.	ID17040208SK010_02a	11	*This AU is listed in Section 4a (EPA approved TMDL). TMDLs from the 2001 Portneuf Subbasin Assessment & TMDL were applied to this AU when no beneficial use impairment was reported in the Subbasin Assessment, 2002/2003 Integrated Report, or additional data. It is recommended to remove this unit from Section 4a and place in the appropriate section.*	Garden Creek was listed prior to the Portneuf TMDL (approved 4-18-2001) being prepared. This AU was included in the Portneuf River TMDL (accepted 4-16-2001). Nutrient and sediment targets apply to this AU as part of the TMDL. This AU supports beneficial use; however, in order for the TMDL to apply, it will remain in Category 4a for this Integrated Report. AUs that meet or continue to support beneficial uses and are not negatively affecting water quality and therefore beneficial uses in downstream receiving waters will be moved to Category 2 in ensuing reporting cycles. Mladenka 3-24-08
285.	ID17040208SK014_02a	11	*Forest Service data on Cherry Creek indicates this AU is not impaired by sediment, phosphorus, or nitrogen (see enclosed 2004 Portneuf River and Blackfoot River monitoring report). However, DEQ data indicates is should be listed in Section 5 (§303(d)) for E.coli.*	Cherry Creek was listed prior to the Portneuf TMDL (approved 4-18-2001) being prepared. This AU was included in the Portneuf River TMDL (accepted 4-16-2001). Nutrient and sediment targets apply to this AU as part of the TMDL. This AU supports beneficial use; however, in order for the TMDL to apply, it will remain in Category 4a for this Integrated Report. AUs that meet or continue to support beneficial uses and are not negatively affecting water quality and therefore beneficial uses in downstream receiving waters will be moved to Category 2 in ensuing reporting cycles. Mladenka 3-24-08

286.	ID17040208SK021_03a	11	*This AU is listed in Section 4a as having an EPA approved sediment TMDL. The 2002/ 2003 Integrated Report shows that sediment was not impairing beneficial uses. The 2001 Portneuf TMDL was applied to several AUs that are not impaired by this pollutant. Also stated in the 2001 TMDL indicated delisting of Pebble Creek, "Information collected through the Beneficial Use Reconnaissance Program indicates that several streams on the 303(d) list (Gibson Jack, Mink, Walker, Bell Marsh, Goodenough, upper Garden, Dempsey, Pebble, and Toponce Creeks) are supporting their beneficial uses; it is recommended that these streams be removed from the 303(d) list."*	Toponce Creek was listed prior to the Portneuf TMDL (approved 4-18-2001) being prepared. This AU was included in the Portneuf River TMDL (accepted 4-16-2001). A sediment target applies to this AU as part of the TMDL. This AU supports beneficial use; however, in order for the TMDL to apply, it will remain in Category 4a for this Integrated Report. AUs that support beneficial uses and are not negatively affecting water quality (and therefore beneficial uses) in downstream receiving waters will be moved to Category 2 in ensuing reporting cycles. Mladenka 3-24-08
287.	ID17040208SK022_03	11	*This AU is listed in Section 4a (EPA approved TMDL) as having a sediment TMDL. The 2002/2003 Integrated Report shows that sediment was not impairing beneficial uses. The 2001 Portneuf TMDL was applied to several AUs that are not impaired by this pollutant. Also stated in the 2001 TMDL indicated delisting of Pebble Creek, "Information collected through the Beneficial Use Reconnaissance Program indicates that several streams on the 303(d) list (Gibson Jack, Mink, Walker, Bell Marsh, Goodenough, upper Garden, Dempsey, Pebble, and Toponce Creeks) are supporting their beneficial uses; it is recommended that these streams be removed from the 303(d) list."*	Pebble Creek was listed prior to the Portneuf TMDL (approved 4-18-2001) being prepared. This AU was included in the Portneuf River TMDL (accepted 4-16-2001). A sediment target applies to this AU as part of the TMDL. This AU supports beneficial use; however, in order for the TMDL to apply, it will remain in Category 4a for this Integrated Report. AUs that support beneficial uses and are not negatively affecting water quality (and therefore beneficial uses) in downstream receiving waters will be moved to Category 2 in ensuing reporting cycles. Mladenka 3-24-08
288.	ID17040208SK023_03b	11	*The draft 2008 report lists this assessment unit in section 4a (TMDL). The 2002/2003 Integrated Report showed full support of CWAL and Salmonid Spawning in this AU. The sediment TMDL from the 2001 Portneuf TMDL was applied to this AU when no beneficial use impairment was reported in the Subbasin Assessment, 2002/2003 Integrated Report, or additional data. This unit's beneficial status should be supporting or not assessed for CWAL and Salmonid Spawning whichever is appropriate.*	Rapid Creek was listed prior to the Portneuf TMDL (approved 4-18-2001) being prepared. This AU was included in the Portneuf River TMDL (accepted 4-16-2001). A sediment target applies to this AU as part of the TMDL. This AU supports beneficial use; however, in order for the TMDL to apply, it will remain in Category 4a for this Integrated Report. AUs that support beneficial uses and are not negatively affecting water quality (and therefore beneficial uses) in downstream receiving waters will be moved to Category 2 in ensuing reporting cycles. Mladenka 3-24-08
289.	ID17040214SK013_02	11	*The 2008 report lists this AU in Section 5 (§303(d)) as impaired by sediment. The 2005 Beaver-Camas Subbasin Assessment & TMDL identified impairment was due to temperature and established a temperature TMDL. Sediment was not identified as a pollutant in the TMDL*	DEQ will remove sediment as a pollutant and implement the Temp TMDL approved in 2005.

			and it appears that no additional BURP data has been collected since the 2003 to support that. We recommend removing this AU from Section 5 for sediment.	
290.	Re: Unassessed Waters and/or Delisted/ Proposed Delisting	12	*Unassessed Waters* *The draft report contains 59 pages of unassessed waters yet fails to draw a comparison to previous reports. The draft report should contain a comparative analysis to previous reports to document that progress is being made to complete the assessment of all Idaho's waters. Further, the draft report should outline a timetable for the completion of un-completed assessments.* *Waters Proposed for De-listing* *The draft report does not contain the list of waters that are proposed for de-listing. Instead, I was able to find this list elsewhere on the DEQ website. This list should be included within the report. In the list of waters proposed for de-listing, a great number of water bodies are proposed for de-listing based on the fact that a TMDL has been developed and/or approved. The TMDL status of a 303(d) listed stream has little relevance as to compliance with water quality standards. A TMDL is no more than a plan on how a water body is going to be brought back into compliance with water quality standards. Therefore, IRU requests that proposed de-listings based on the development/approval of a TMDL remain on the 303(d) list until such time as they actually comply with water quality standards.*	The Draft 2008 Integrated Report (IR) makes no attempt to detail the differences between 2008 and 2002 due to its draft status. Often comments and data submitted during the comment process result in changes between the final and draft reports. DEQ has provided a summary of the 2008 report and comparisons are free to be made by the audience. Idaho's Surface Water Monitoring Plan, October 2004, details the state's approach to assessment of all Idaho's waters. DEQ disagrees that waters impaired by pollution must be listed in Section 5. Section 303d requires TMDLs be calculated for "pollutants". Flow alteration for example, is not a pollutant as defined by the CWA. See §502(6) and EPA Guidance for 2006 Assessment, Listing and Reporting requirements pursuant to §303(d), 305(b) and 314 of CWA (July 29, 2005). The sole purpose of Section 5 is to identify and prioritize Assessment Units for TMDL development. Section 5 is reserved for impaired Assessment Units that are due a Total Maximum Daily Load (TMDL). Circumstances exist that can impair an Assessment Unit but for which DEQ cannot write a TMDL. These circumstances include: 1) An EPA established TMDL; 2) a Section 4(b) justification; or 3) impairment due to a non-pollutant (flow or habitat alteration). AUs that fall into one of those 3 situations are placed in Section 4 of the IR. Section 4 is defined as AUs with impaired beneficial use(s) and/or which fail to meet WQS. Two points should be emphasized here, first AU-pollutant combinations are independent of one another and therefore an AU can appear in both Section 4 and Section 5. Second is that when an AU is found in Section 4 it means that the AU is still impaired. It is not until the TMDL or other

				remedial plan is implemented that DEQ will re-monitor and assess whether the AU continues to be impaired. When DEQ can demonstrate that the AU supports beneficial uses and meets WQS the AU will be moved into Section 2. Impairment by flow and/or habitat alteration is not suitable for TMDL development. Almost all AUs in Section 4c are impaired by other causes such as sediment. TMDLs are then developed for those pollutants best suited for TMDL development. Implementing those TMDLs can often work to address flow and habitat alteration impairments.
291.		13	*Figure 6 describing the Tier I through Tier III data is shown opposite as described in the narrative.*	This oversight has been corrected.
292.	General Comment	13	*We recommend naming all of the listed tributaries in the tables. For example, Bacon and Bean Creeks are not listed in Section 5. Instead, it lists: "Numerous tribs to St. Joe Headwaters to NP St. Joe River", which covers 148.18 miles of stream. Not naming all the tributaries leads to confusion, such as with Trail Creek in Section 2 where "ID17010301PN019-02 Trail creek - headwaters and tributaries Trail to Teepee (sic) Cr.", which includes 35.65 miles of stream is listed. However, main Trail Creek has an existing TMDL but is not listed in Section 4a (or anywhere else).*	This short coming is well understood. Printing the IR at that level of detail would transform a document that has hundreds of pages into one that has 1000's of pages. In order to fully describe waters in the IR, DEQ provides an interactive mapping web site to assist users in finding the waters they are interested locating.
293.	ID17010104PN004_02	13	*We fully support that Blue Joe Creek be listed in Category 4b as opposed to Section 5.*	DEQ's effort to document a Section 4(b) justification for the metals impairing Blue Joe Creek fell short as additional documentation from the CERCLA removal action on Blue Joe Creek was disclosed by EPA. Here is an excerpt from the 2004 Removal Action report: "…surface water and groundwater treatment was not addressed as part of the Removal Action. It is anticipated that beneficial effects from the completed work will result in minimizing the availability of source metals contamination. The IDEQ will address water quality issues as part of its TMDL program by establishing metals load limits for Blue Joe Creek in 2005. The TMDL will require, by law, a TMDL implementation plan that may require additional projects aimed at reducing metals loading. [....] Compliance with the TMDL plan will be the responsibility of CLI, the property owner (EPA 2003)."

				-Removal Action Report Continental Mine. USEPA. January, 2004. Based on the above disclosure it is clear that Blue Joe needs to be in Section 5 and a TMDL does need to be developed unless the USFS or the land owner can provide Tier 1 data indicating that Blue Joe Creek meets Idaho WQS and supports it's beneficial uses whereby a de-listing to Section 2 of the IR can be proposed. Alternatively, if interested parties can demonstrate a clear downward trend in metals concentrations and that remedial actions on Blue Joe Creek will result in WQS being attained and the beneficial uses being supported in a reasonable timeframe then a 4(b) justification could be proposed for the 2010 IR.
294.	ID17010104PN008_02	13	*The vast majority of the watershed is also roadless with no history of timber harvest and virtually no other past management. It is unclear why this stream is listed for temperature from the "source to mouth" in Section 5.*	DEQ agrees that the temperature listing may not reflect natural stream temperatures and the land use activities in the watershed; however, using the current assessment methodology DEQ is required to list the assessment unit for temperature violations when temperature data is available. Continuous temperature data loggers deployed near the mouth of the stream, in the forested portion of the watershed, show violations of Idaho's numeric water quality criteria. Violations of this criteria warrant the assessment unit/temperature listing. Exceedances of water quality criteria will be reviewed during the five-year review period of the Kootenai/Moyie Subbasin Assessment and TMDL. During the five-year review the temperature listing will be evaluated against the natural conditions provision in the Idaho WQS. Evaluation against the natural condition provision will take into consideration land use activities in the watershed.
295.	Lake Pend Oreille (tributaries Trestle Creek, Gold Creek, and Granite Creek)	13	*It is unclear why these streams are listed as having water temps. that do not support salmonid spawning when years of redd count data from Idaho Department of Fish and Game (see Downs and Jakubowski 2006) show that these streams support the vast majority of bull trout spawning in the Pend Oreille system. Data from continuous-recording data loggers, which has been previously submitted to IDEQ, support what redd counts indicate: Temperatures in these streams support salmonid spawning and cold water biota.*	Pend Oreille Lake does harbor a bull trout population with bull trout spawning occurring in tributary streams which are failing to support Idaho's numeric bull trout water quality criteria. Failure of the criteria does not preclude bull trout from spawning in these tributaries but it can impact their productivity and survival rates.
296.	Lightning Creek (and tributaries)	13	*Listed in Section 5; however, a final TMDL was recently completed.*	EPA Approved TMDLs in this subbasin will be moved to section 4a.

297.	St. Joe River (from Packsaddle Creek up to Medicine)	13	*Mixed land use excludes some of the bigger streams like Gold and Simmons. Included are Bacon Creek and Bean Creek, which are shown as not fully supporting beneficial uses although they are both in a roadless area and have had no timber management and little to no historic mining. It appears no surveys were done in these streams. Given the history of these streams and the lack of data, it is difficult to understand why they are listed for temp.*	Bacon and Bean Creek are included in a larger assessment unit (ID171010304PN041_02) in which Idaho numeric water quality temperature standards were violated. Commenter is correct, no surveys have been collected for these two streams explicitly. The Idaho DEQ Coeur d'Alene Regional Office tracks water quality for approximately 8,800 miles of stream in north Idaho. To help track water quality for this large quantity of surface water, streams are lumped into assessment units according to stream order and land use types. Lumping streams into assessment units gives DEQ the latitude to make reasonable assumptions about water quality when not all streams can be monitored. Efforts will be made during the five-year review of the St. Joe Subbasin Assessment and Total Maximum Daily Load to determine the validity of these listings. If needed, changes to the assessment unit listing status will be made accordingly during this time.
298.	West Gold Creek	13	*West Gold is listed in Section 4a as having an approved TMDL for sediment; however, the TMDL for Gold Creek states that "only Gold Creek is water-quality limited", and that West Gold Creek, Chloride Gulch, and Kickbush Gulch are not. Conversations between Bob Steed (IDEQ) and Jason Gritzner (JPNF) during the West Gold Project analysis indicated West Gold was listed in error in the 2002 integrated report and apparently the error has carried over into the current report.*	Commenter is correct; West Gold Creek assessment unit/pollutant (sediment) combination will be removed from section 4a of the Integrated Report.
299.		14	*Support for the five part listing process and policies adopted by IDEQ: The City supports IDEQs use of the five part listing process recommended in EPA guidance to the states (EPA, 2007) and listing policies and procedures by IDEQ in the draft 2008 Integrated 303(d)/305(b) Report (IDEQ, 2008). We are pleased to see that the 2008 document includes essentially all of the listing categories and requirements. Finally, we note that the public comment period for the 2008 Report is two weeks shorter than the comment period on the 2002 list. We suggest that in the future, additional time (e.g. 60-90 days) be allowed for the public to review and assemble data requested by IDEQ and that the proposed bi-annual list be scheduled so that IDEQ has time to fully review the data and*	DEQ provided ample to allow interested parties to comment. No stake holders requested an extension to the public comment while the public comment period was open. In 2002 DEQ provided an extended comment period to facilitate stake holders during the change from Water Quality Limited Segments to AUs.

			comments prior to the April 1 of even year reporting deadline (e.g. October or November of the year prior to the filing).	
300.		14	*Tiered Data Section 1 Listings: Supports All Uses listing is Under inclusive.* *The City supports IDEQ's Tiered data approach identified on pages 15-19 of the Report. Figure 6 on page 18 appears to have text inconsistent with the Tiered data descriptions and should be corrected. Figure 6 should be corrected to indicate Tier I data are the highest quality and Tier III data are the lowest, as described in the text.*	This mismatch of diagram and text has been corrected.
301.	Boise River (Diversion Dam to Mouth)	14	*The lower Boise River from Diversion Dam to the mouth is NOT listed for flow or habitat alteration despite listing of the reach immediately above for flow alteration. The lower Boise River is a highly regulated stream with three upstream reservoirs that are jointly operated to meet irrigation, flood control and other uses.* *Flow and habitat assessments have been done on the lower Boise River by Idaho Fish and Game, Asbridge and Bjornn (1988), and USGS (1997). These studies, in addition to chemical, physical and biological data collected by USGS for the Lower Boise Watershed Advisory Group and contained in the Lower Boise River TMDL (IDEQ, 2000) find that flow alteration and habitat contribute to impairment of use in ALL reaches of the Boise River below Lucky Peak Dam.* *The LBR TMDL finds that:* *"Sediment, temperature, flow, and habitat conditions contribute to the impairment of the cold water biota." (p.1, Executive Summary, LBR TMDL, IDEQ, 2000);* *"In addition, flow and habitat conditions impair aquatic life uses in the Boise River." (p 31, LBR*	Agreed. These impairments have been added and this AU is now additionally displayed in Section 4c.

			TMDL, IDEQ 2000); *"Sediment, temperature, and flow and habitat conditions in the river all contribute to impairment of cold water biota and salmonid spawning." (p. 47, LBR TMDL, IDEQ 2000);* *"Table 10: Status of Aquatic Life Uses in Lower Boise River Reach Other Causes of Impairment Boise River: Lucky Peak to Barber Flow Alteration, habitat modification (lack of cover, lack of gravels, channelization, embeddedness, and armored substrate) Boise River: Barber to Star Same as above Boise River: Star to Notus Same as above Boise River: Notus to Mouth Same as above (p. 47, LBR TMDL, IDEQ 2000);* *"Many of man's activities in the lower Boise River watershed contribute to degradation of flow and habitat conditions. Flow manipulation for flood control, irrigation, impoundments, flood control activities such as clearing debris and construction of levees, gravel mining, unscreened diversions, angling pressure and barriers in the river all have adverse affects on habitat. It is DEQ's position that habitat modification and flow alteration, which may adversely affect beneficial uses, are not pollutants under Section 303(d) of the Clean Water Act. There are no water quality standards for habitat or flow, nor are they suitable for estimation of load capacity or load allocations. Because of these practical limitations, TMDLs will not be developed to address habitat modification or flow alteration." (p.48, LBR TMDL, IDEQ, 2000).* *The City recommends that IDEQ list the Boise River from Diversion Dam to the Mouth for flow alteration and habitat in Section 4c based on the Tier 1 data and multiple lines of evidence described above.*	
302.	General Comments	14	*Proposed Listing Decisions* *a. Unassessed Waters (Part 3)* *The City generally concurs with IDEQ's listing of the*	a. Comment noted. b. Comment noted. USGS data for E. coli continue to show violations of the standard in the lower part of the river.

			Boise River from Lucky Peak to Indian Creek as unassessed, at least for BURP Large River protocols. However other data useful in making listing decision has been collected on the mainstem Boise River during this listing period. The City participates in the Lower Boise Watershed Council (LBWC) and helps fund USGS monitoring of the Lower Boise River and tributaries from Lucky Peak Dam to the mouth. USGS monitoring includes chemical, physical, and biological monitoring of the river. There are data in the USGS database for the last five years that are useful in informing the status of some water quality standards (e.g. Dissolved Oxygen…). *Additionally, the City has collected NPDES and special study data on E coli, temperature, Dissolved Oxygen and other parameters that may be useful in determination of listing status. In response to the call for data, the City has included E coli, DO, and Temperature data for IDEQ review and use in the 2008 Integrated Report.* *b. TMDLs Approved (Part 4a)* *The City generally concurs with the proposed listings in part 4a for the lower Boise River sediment and bacteria TMDLs. Since the Bacteria TMDL was completed, the bacteria standard has changed from fecal coliform to E. coli. The City has collected, compiled, and submitted E. coli data for the Boise River to IDEQ (January 4, 2008 e-mail to Craig Shepard). The data include 777 data points from 10 sites on the Boise River from Parma to Diversion Dam. The data should useful in determination of the listing status of the mainstem Boise River for bacteria.* *c. Delisting the Lower Boise River for Nutrients* *The City supports IDEQ's proposed delisting of the lower Boise River for nutrients based upon our review of the draft Report and USGS and City collected Dissolved Oxygen (DO) and Chlorophyll a data collected during the last five years. The City has assembled Dissolved Oxygen and Chlorophyll a data collected by USGS for all lower Boise River sites from*	c. Thank you for your comment. DEQ does intend to delist the Lower Boise River for nutrients. An Implementation Plan that includes allocations for the Boise River to meet the SRHC TMDL has been prepared. d. It is DEQ's opinion that the majority of thermal loading in the lower Boise River is from atmospheric conditions. With that in mind, DEQ may be developing a temperature TMDL in the future. Additionally, the upper river is listed because of exceedance of the salmonid spawning criteria, but no exceedance of the coldwater aquatic life standard have occurred.

			2000-2008 (attached). The data for the last five years show that seasonal average (May – Sept) Chlorophyll a data range from about 2 µg/l at Diversion Dam to 9.6 µg/l at Parma and that Dissolved Oxygen always was greater than 6 mg/l and 75% saturation. The City also has collected DO data from in-stream monitors at 15 minute intervals at two locations, Glenwood and Linder Bridges since 2004. Review of the DO data from these locations support the delisting decision proposed by the IDEQ in the 2008 Integrated Report. The USGS and City data confirm the IDEQ assessment on nutrient impairment of the lower Boise River (IDEQ, 2001). Additionally, the Snake River-Hells Canyon TMDL was developed and approved by EPA in 2004. SR-HC TMDL requires a 78% reduction in Total Phosphorus from the lower Boise River. Listing of the lower Boise River for nutrients should be either as category 2 based on the data for the last five years (e.g. no impairment) or as an alternative/multiple listing possibility as 4a (TMDL completed, SR-HC in 2004) or 4b (other plan, Lower Boise River allocations to meet SR-HC) may be appropriate. *d. Lower Boise River Temperature Data IDEQ assessed temperature in the lower Boise River (IDEQ, 2000) and concluded that temperature exceedances were due primarily to solar warming rather than to discharges and that a temperature TMDL was not warranted. EPA listed the mainstem of the Boise River for temperature in 2001. The City has been collecting temperature data from 14 locations within the Boise River watershed above and below Lucky Peak Dam from early 2002 to the present. Temperature data generally show anthropogenic cooling of 5-12C for waters released from Lucky Peak Dam during the summer period as compared to inflow temperatures above Anderson Ranch and Arrowrock Reservoirs. Temperature Data for the lower Boise River for the critical period (July 15-August 15) identified in IDEQ policies for the period 2002 through 2007 are shown below:*	

303.	Stuart, Cottonwood, and Crane Creeks	14	*Stuart, Cottonwood, and Crane Creeks appear to be incorrectly listed based on the 2008 IDEQ Listing Principles and Policies (IDEQ, 2008) concerning intermittent streams (p 24).* *Biological data was collected from only one of the three streams, Cottonwood Creek. Data was collected less than two miles below Aldape summit and are over a decade old (1996 and 1997). USGS Flow records from Cottonwood Creek are collected about 3-4 miles below (downstream) from the biological monitoring site. USGS flow records show zero flow in Cottonwood Creek every year for a minimum of 1-2 months. The definition of an intermittent water in the State Water Quality Standards is "…zero flow for at least one week for most years." for ungaged sites.* *The listing for Cottonwood, Crane, and Stuart Creeks does not identify a responsible pollutant. Federal Listing guidance to the states and IDEQ's listing policies identify minimum requirements for waters on the section 5 list, including identification of a pollutant causing the impairment. The listing identifies the pollutant as unknown and therefore is not valid or consistent with minimum requirements for state or federal listing as a Category or Section 5 water.* *Additionally, both the Final WBAG II (Grafe et al. 2002) and IDEQ's 2008 listing policies (IDEQ, 2008) indicate that aquatic community indexes cannot be applied to undesignated, intermittent surface waterbodies. It appears that old data of insufficient quality are the basis for listing of all three creeks.* *Using IDEQ's listing procedures and policies; it appears that all three intermittent foothills creeks should be listed as Part 3, unassessed waters unless other data of sufficient quality are available to provide the basis for listing.*	Thank you for the comments. 1) Cottonwood Creek is conjoined into one assessment unit with Stewart Gulch and Crane Creek because all three creeks are similar in terms of land use, location, and size. Hence, what happens to Cottonwood, also happens to Stewart and Crane. Splitting them off is a possibility, but the force for doing so must spring from a real-world difference between the creeks, such as one flowing through forest while the other is irrigated. Maps do not show much difference, and combining them into one AU seems to be appropriate. 2) This assessment unit was listed based on BURP data. You are correct in noting that if these sites were to be assessed today, the aquatic community indices would not apply, because the streams are intermittent. However, these sites were assessed using an older equivalent of 'WBAG', which had no such prohibition on assessing intermittent streams. 3) Cottonwood Creek was listed on the 1998 303(d) list. So much time has passed that the rationale for delisting will have to be better than 'does not conform to current assessment standards'. We will require data that show that the stream meets WQS when it flows.
304.	ID17050101SW001_07	15	*The Mid Snake River/Succor Creek Subbasin Assessment and Total Maximum Daily Load recommended listing*	This AU (ID17050101SW001_07) refers to the Snake River between Browns Creek and CJ Strike Reservoir, which is not recommended for a

			temperature as a pollutant limiting water quality in the Snake River. The draft 2008 Integrated Report does not list temperature in Category 5. IPC expects temperature to be listed to Category 5 for this AU in the final 2008 Integrated Report	temperature listing. I suspect this comment was intended to be directed at ID17050103SW001_07, Snake River between Homedale and State Line. See below. AUs ID17050103SW001_07, 000_07, 006_07b will be listed for temperature. This is the Snake River from Swan Falls to the Boise River. The Snake River upstream of Swan Falls will not be listed for temperature.
305.	ID17050101SW006_07a	15	*IPC expects TDG on the Snake River below the C.J. Strike Project to be listed to Category 4a and not Category 5 as recommended by the most recent U.S. Environmental Protection Agency-approved King Hill-C.J. Strike Reservoir Subbasin Assessment and Total Maximum Daily Load.*	A TMDL for TDG was not included in the EPA approved TMDL, so inclusion in Section 4a would not be appropriate at this time. It was recommended that TDG be listed. If IPC has additional data suggesting that TDG should not be listed or if measures have been taken to alleviate the occasional high values, then that should be presented for the next listing cycle.
306.	ID17050103SW000_07	15	*The Mid Snake River/Succor Creek Subbasin Assessment and Total Maximum Daily Load recommended listing temperature as a pollutant limiting water quality in the Snake River. The draft 2008 Integrated Report does not list temperature in Category 5. IPC expects temperature to be listed to Category 5 for this AU in the final 2008 Integrated Report.*	We agree. Temperature is now in category 5.
307.	ID17050103SW006_07	15	*The Mid Snake River/Succor Creek Subbasin Assessment and Total Maximum Daily Load recommended listing temperature as a pollutant limiting water quality in the Snake River. The draft 2008 Integrated Report does not list temperature in Category 5. IPC expects temperature to be listed to Category 5 for this AU in the final 2008 Integrated Report*	We agree. Temperature is now in category 5.
308.	ID17050103SW006_07b	15	*IPC expects TDG on the Snake River below the C.J. Strike Project to be listed to Category 4a and not Category 5 as recommended by the most recent U.S. Environmental Protection Agency-approved King Hill-C.J. Strike Reservoir Subbasin Assessment and Total Maximum Daily Load.*	This assessment unit is between Swan Falls and Homedale. The comment references a different part of the Snake River, assessment unit ID17050103SW006_07. The substance of the comment has been addressed in the appropriate assessment unit. That assessment unit is now in category 5 because of temperature pollution. Total Dissolved Gases have been delisted.
309.	ID17050114SW001_06	15	*Boise River-Indian Creek to mouth, hereafter referred to as the Lower Boise River, was listed in the Principles and Policies for the 2002 Integrated (303(d)/305@) Report as requiring a total maximum daily load for temperature and*	DEQ will be responding to Idaho Power's assertion that nutrients impair beneficial use support in the River on a point by point basis in the text below. We note that contribution to impairment in downstream reaches

			nutrients. The draft 2008 Integrated Report proposes delisting the Lower Boise River for nutrients based on the Lower Boise River Nutrient Subbasin Assessment. The reference for the proposal is provided in 2008 Integrated Report: Delisted Assessment Units. Specifically, it states, "The analysis indicates that nutrients are not impairing aquatic life or recreational beneficial uses in the lower Boise River." The Idaho Department of Environmental Quality cites a single conclusion of the Lower Boise River Nutrient Subbasin Assessment. Other conclusions follow. The analysis indicates that nutrients are not impairing aquatic life or recreational beneficial uses in the lower Boise River. Thus, nutrients will be proposed for 303(d) de-listing. However, nutrients that originate in the lower Boise River watershed are contributing to the impairment of beneficial uses in the Snake River and Brownlee Reservoir. 40 CFR 131.10(b) says that the State shall take into consideration the water quality and standards of downstream waters and shall ensure that its water quality standards provide for the attainment and maintenance of water quality standards of downstream waters. For this reason, nutrient allocations driven by the Snake River - Hells Canyon TMDL (due December 2001) may be necessary. The Snake River - Hells Canyon TMDL may allocate a total phosphorus load to the mouth of the lower Boise River to help restore the impaired beneficial uses to full support. The phosphorus sources in the lower Boise River watershed will then be allocated loads and waste loads to meet the load allocation for the lower Boise River. Upon completion of the allocations, an implementation plan will be developed within 18 months by the Lower Boise River Watershed Advisory Group and supporting agencies. The Snake River-Hells Canyon Total Maximum Daily Load (TMDL) presented data on excessive total phosphorus concentrations in the Snake River inflow to Brownlee Reservoir and reported that nuisance algal growths have been routinely observed in the Snake River and upper end of Brownlee Reservoir. "Load allocations assigned to inflowing tributaries are based on inflow concentrations meeting the 0.07 mg/L	is not a basis for listing. Various nuisance thresholds have been established by different studies. However, no thresholds have been proposed in relation to the adverse impacts to aquatic life. Impacts to aquatic life are generally based on DO and pH problems and the reduction of living space for aquatic organisms due to excessive algal biomass. In August 1997, the USGS took hourly DO measurements over 24 hour periods at 5 sites (Eckert, Glenwood, Middleton, Caldwell and Parma). Normal diurnal DO patterns were observed but concentrations never dropped below the criteria. No DO measurements less than 6.0 mg/L have been recorded from Lucky Peak to the mouth of the river from 1986 to 1999 (by USGS). The City of Boise submitted diurnal dissolved oxygen data to IDEQ during the listing process. Dissolved oxygen data was collected at two sites, Glenwood and Linder bridges (both below the wastewater treatment plants), in 15 minute intervals July 2004 through 2007. Dissolved oxygen (mg/L) never dropped below 6.0 mg/L. 0.08% and 1.34% of the dissolved oxygen percent saturation values were below 75% saturation at Glenwood and Linder monitoring sites, respectively. The relationship between Lower Boise River channel hydraulics, nutrients, and periphyton growth was examined in the Lower Boise River Nutrient Subbasin Assessment (IDEQ 2001). Results indicated that during the irrigation season (April to October) when conditions are most suitable for periphyton growth, velocities in the Lower Boise River are higher than the scour threshold, even in low flow years. The absence of nuisance levels of periphyton indicates that the macroinvertebrates have ample living space and that the intergravel flows are not impeded. Hydraulic conditions in the Lower Boise River mitigate for nutrient enriched conditions. In addition, DEQ complaint logs (1997-2000) indicated no complaints of nuisance growth. Irrigation companies and other water users did not report algal impediment at river withdrawal locations during the same time period. Recreational and aesthetics beneficial uses are not impaired by algae. Suspended chlorophyll a samples were collected in the Boise River (Diversion, Glenwood, Middleton and Parma) from 1995-2007. Only 4 of the measured values exceeded 40 ug/L and only 14 samples in a 12 year period exceeded 25 ug/L.

			total phosphorus target." Both the Lower Boise River Nutrient Subbasin Assessment and the Snake River-Hells Canyon Total Maximum Daily Load (TMDL) clearly identify the need for nutrient reductions in the Lower Boise River to meet the nutrient target downstream in the Snake River for the protection of designated beneficial uses. Further, the Lower Boise River Nutrient Subbasin Assessment states, "40 CFR 13l.l0(b) says that the State shall take into consideration the water quality and standards of downstream waters and shall ensure that its water quality standards provide for the attainment and maintenance of water quality standards of downstream waters." Delisting nutrients in the AU ID17050114SW001-06 is not consistent with the conclusions of the Lower Boise River Nutrient Subbasin Assessment and the Snake River-Hells Canyon Total Maximum Daily Load (TMDL) or the statutory requirements of 40 CFR 131.10(b). IPC submits these revised draft 2008 Integrated Report comments. Delisting nutrients in the Lower Boise River is not supported by the documentation record. If delisting is forwarded, please provide further justification as to why the conclusions of the Lower Boise River Nutrient Subbasin Assessment and the Snake River-Hells Canyon Total Maximum Daily Load (TMDL) (i.e., "Load allocations assigned to inflowing tributaries are based on inflow concentrations meeting the 0.07 mg/L total phosphorus target." "The phosphorus sources in the lower Boise River watershed will then be allocated loads and waste loads to meet the load allocation for the lower Boise River.") are not justified.	It has been acknowledged that although nutrients are not impairing beneficial uses in the Boise River, they are contributing to the impairment of beneficial uses in the Snake River and Brownlee Reservoir. The Lower Boise River received a phosphorus allocation in the Snake River-Hells Canyon Implementation Plan. The lower Boise River is a highly regulated flow and habitat altered system (three large dams above and approximately eighty diversions). There is little to no gravel recruitment and thus little suitable habitat. The lack of suitable macroinvertebrate taxa is attributed to this reality in the upper reaches and due to increased sediment loading in the lower reaches. There is no mention of nutrients contributing to the low scores in the macroinvertebrate index in any USGS reports. IBI scores for all sites were negatively correlated with maximum instantaneous water temperature, specific conductance, and suspended sediment; as well as the basin land-use metrics of area of developed land, impervious surface area, and number of major diversions within a subbasin. There is also an approved TMDL for sediment. DEQ has drafted an Implementation Plan which includes phosphorus allocations for the river to address nutrient impairment in SRHC. It is this body of evidence that leads DEQ to believe that the lower Boise River is not impaired by nutrients.
310.	ID17050201SW002_08	15	*Hells Canyon Reservoir appears on the draft 2008 Integrated Report: Category 5 list for temperature and TDG. The Snake River-Hells Canyon Total Maximum Daily Load (TMDL) was approved for these pollutants by the U.S. Environmental Protection Agency in 2004. IPC understands these listings were errors and expects temperature and TDG to be moved to Category 4a in the final 2008 Integrated Report.*	This comment is accurate - temperature and sediment will be moved to 4a.
311.	ID17060101SL001_08	15	*The AU appears on the draft 2008 Integrated Report: Category 5 list for temperature and TDG. The Snake*	DEQ agrees with these points.

			River-Hells Canyon Total Maximum Daily Load (TMDL) was approved for these pollutants by the U.S. EPA in 2004. IPC understands this listing was a jurisdictional oversight. IPC expects temperature and total dissolved gases to be moved to Category 4a in the final 2008 Integrated Report.	
312.	ID17060101SL002_08	15	*The AU appears on the draft 2008 Integrated Report: Category 5 list for temperature and TDG. The Snake River-Hells Canyon Total Maximum Daily Load (TMDL) was approved for these pollutants by the U.S. EPA in 2004. IPC understands this listing was a jurisdictional oversight. IPC expects temperature and total dissolved gases to be moved to Category 4a in the final 2008 Integrated Report.*	DEQ agrees with these points
313.	ID17060101SL003_08	15	*The AU appears on the draft 2008 Integrated Report: Category 5 list for temperature and TDG. The Snake River-Hells Canyon Total Maximum Daily Load (TMDL) was approved for these pollutants by the U.S. EPA in 2004. IPC understands this listing was a jurisdictional oversight. IPC expects temperature and total dissolved gases to be moved to Category 4a in the final 2008 Integrated Report. The Snake River from Hells Canyon Dam to Sheep Creek was listed in Category 5 as water-quality limited by dissolved oxygen on the preceding integrated report. Dissolved oxygen does not appear in any category in the draft 2008 Integrated Report. IPC understands removal of the pollutant was a database error. IPC expects dissolved oxygen to be listed in the final 2008 Integrated Report.*	DEQ agrees with all these points.
314.	Lower Boise ID17050114SW001_06	15	*Boise River-Indian Creek to mouth, hereafter referred to as the Lower Boise River, was listed in the Principles and Policies for the 2002 Integrated (303(d)/305(b) Report as requiring a total maximum daily load for temperature and nutrients. The draft 2008 Integrated Report proposes delisting the Lower Boise River for nutrients based on the Lower Boise River Nutrient Subbasin Assessment. The reference for the proposal is provided in 2008 Integrated Report: Delisted Assessment Units. Specifically, it states, "The analysis indicates that nutrients are not impairing*	Thank you for your comment. Allocations for the Boise River to meet the SRHC TMDL have been prepared.

			aquatic life or recreational beneficial uses in the lower Boise River." IPC understands the proposal to delist the Lower Boise River for nutrients, is no longer intended. IPC expects nutrients, and more specifically total phosphorus, to be listed in the final 2008 Integrated Report: Category 5 as a pollutant limiting water quality in the Lower Boise River and downstream Special Resource Waters. The Snake River-Hells Canyon Total Maximum Daily Load (TMDL) presented data on excessive total phosphorus concentrations in the Snake River inflow to Brownlee Reservoir and reported that nuisance algal growths have been routinely observed in the Snake River and upper end of Brownlee Reservoir. "Load allocations assigned to inflowing tributaries are based on inflow concentrations meeting the 0.07 mg/L total phosphorus target."	
315.		16	*In order for the public to have a clearer understanding of water bodies that have been delisted, the Final 2008 IR should include information that indicates if any water bodies listed in the 2002 IR in the following HUCs are now delisted as a result of water quality data that is older than five years.*	AUs can be delisted with data older than 5 years per the Tiered Data approach outlined in WBAG2. It is stressed that DEQ believes that delisting an AU solely on data older than 5 years old and outside of the context of a TMDL or SBA is not supported by WBAG2.
316.	ID17010215PN028_03	16	*Goose Creek was listed in Section 5 of the 2002 IR for path and the 2008 IR lists Goose Creek for fecal coliform. We believe Goose Creek should also be listed for sediment due to information prepared by the Idaho Panhandle National Forests in 1999 as part of the Douglas-fir Beetle Project Environmental Impact Statement. The Priest Lake Ranger District Douglas-fir Beetle Project fisheries and watershed project files included analysis of the Goose Creek watershed. The fisheries analysis project file P-FI-3 for the 9,630 acre drainage indicated the lower reach of Goose Creek has been heavily impacted due to channelization, grazing, and old logging activities. The fisheries analysis included the following statements. "This stream appeared to have fresh bedload deposition on the lower reach, as well as a lot of fines", and "Goose Creek*	DEQ Assessor Glen Rothrock is very familiar with the extremely degraded stream conditions of mid-section Goose Creek. Glen was part of a team led by the Agricultural Conservation Partnership that was attempting a significant stream rehabilitation project in cooperation with a private ranch owner. As KEA is aware, project plans were abandoned. Goose Creek was initially placed within Section 5 of the Integrated Report in 2002 for the pollutant of concern "pathogens", which is now labeled fecal coliform. This listing resulted from DEQ sampling of bacteria within lower Goose Creek, and having bacteria results exceed the Idaho WQ Standards numeric criteria for secondary contact recreation. Suspicion is that source of bacteria is from upstream cattle grazing. For new entries onto the CWA §303(d), subsequent to the 1994/96 and

			flows through cattle grazing land for most of its length. Decades of overgrazing has resulted in unstable banks, large amounts of fine sediment, and a downcut condition of the channel." The fisheries project file (P-FI-3) also states that according to information gathered in 1985 that, "the lower reach of Goose Creek has been heavily impacted by channelization, grazing and old (pre 1950) logging activity.' The report also stated that, 'very few spawning sites were observed in this reach due to the heavy amounts of sand filling the channel." (Hathaway T.S. project file 1985)The watershed analysis in project file P-WA-172 for Goose Creek included the following statements. "Current road densities are high and a significant portion of the Goose Creek watershed was logged in the last 25 years", and "In general, most of Goose Creek is not in properly functioning condition, primarily due to past human caused disturbances, including conversion to agricultural use, riparian roads, cattle grazing, and even-aged timber management." We also believe Consalus Creek should be added to Section 5 as being impaired by sediment due to the Forest Service information found in two documents cited regarding Goose Creek. The watershed analysis in project file P-WA-172 for Goose Creek indicated that Consalus Creek is a major tributary to Goose Creek. The fisheries project file P-FI-3 for Goose Creek includes the following statements regarding Consalus Creek. "The southern portion of the Goose Creek Salvage Area is in the headwaters of Consalus Creek. Much of the upper Consalus drainage has been harvested in the past 50 years. Many of these units have been a source of fine sediment in Consalus Creek. Road 1144 is located in the floodplain and lower slopes of Consalus Creek for several miles also (are) (sic) contributing sediment to the system." The watershed project file P-WA-172 includes the following statement. "Goose Creek is a tributary to the Upper West Branch." We note that Section 5 of the 2008 IR lists segments PN027_03 and PN027_04 of the Upper West Branch for combined biota/habitat bioassessments. It appears the two segments listed for the Upper West Branch would also	1998 lists, it has been a general DEQ policy to not list a specific pollutant of concern until a formal Subbasin Assessment is completed. In the 2002 & 2004 Integrated Reports, the term "Combined Biota/Habit Bioassessments" is a term that essentially means "pollutant unknown" (evidently, the term "unknown" for a pollutant will be replaced in the final 2008 IR). This is the listing you refer to for Upper West Branch Priest River. Since Goose Creek had sample data to show a bacteria criteria violation, this became the listed pollutant of concern. So far there has not been a Beneficial Use Reconnaissance Project (BURP) survey on Goose Creek. It is the results of the BURP data that DEQ often uses to base a new §303(d) listing (and generally again, with "unknown" as the pollutant of concern). Subbasin Assessments are in the future for Goose Creek and Upper West Branch Priest River (the latter as cited in Addendum – Priest River Subbasin Assessment and TMDL, 2003). When the Subbasin Assessments are conducted, DEQ will seek and welcome all of the historic land use and fisheries information cited in the KEA comment. Lastly, the majority of Consalus Creek is in Washington State, which DEQ does not have jurisdiction for a §303(d) listing (as well as upper Goose Creek). A Subbasin Assessment and subsequent TMDL would incorporate land use activities and load allocations from Washington, but only in cooperation and agreement with Washington jurisdictional entities.

			confirm the need to list Goose Creek and Consalus Creek for sediment problems in order to prevent any further impairment to the Upper West Branch.	
317.	Lake Coeur d'Alene	16	*It is apparent that Coeur d'Alene Lake is impaired due to nutrients and sediment. This is pointed out in previous DEQ Integrated Reports, including the June 2, 2003 draft Integrated 303(d)/305(b) Report and the September 30, 2005 DEQ Principles and Policies for the 2002/2003 Integrated (303(d)/305(b)) Report. Section 5 of both Reports indicated the Lake was impaired due to nutrients and sediment.* *The 2008 IR again in Section 5 shows the Lake as being impaired due to nutrients. On page 38 of the 2008 IR HUC 17010303, under Coeur d'Alene Lake it is stated Physical substrate habitat alterations, Causes unknown Nutrients Suspected Impairment. The figure of 95.46 miles is also listed on page 38.* *There is also the December 23, 1999 Idaho Department of Health and Welfare Division of Environmental Quality document "Coeur d'Alene Lake and River (17010303) Sub-basin Assessment and Proposed Total Maximum Daily Loads." On page one of the Executive Summary the first sentence states "The Coeur d'Alene Lake and River Sub-basin consists of the Coeur d'Alene Lake and River and those water bodies which drain directly to the river and the lake."* *However, on page seven of this document there is a discussion regarding Carlin Creek and Turner Creek. It is stated these water bodies had been listed on the 1996 list but they were removed as a result of more recent water quality data that indicated these Creeks were not water quality limited. We have the following questions regarding the status of Carlin Creek and Turner Creek as they pertain to the 2008 IR. Is there DEQ survey data less than 5 years old that confirms no nutrients and/or sediment are moving through either Creek and then into Coeur d'Alene Lake?* *If any DEQ water quality surveys have been completed in calendar year 2006 or 2007 in the Carlin Creek watershed or Turner Creek watershed, are these*	Coeur d'Alene Lake has never been listed with "sediment" as a pollutant of concern. In the 2002 Integrated Report, the listing for 17010303PN001_02 represents numerous, small 1st and 2nd order tributaries to the lake. The listing was for sediment and nutrients, but 17010303PN001_02 was mistakenly placed in Section 5: Impaired Waters: Lakes. In the draft 2008 IR, 17010303PN001_02 is again listed in Section 5 as KEA referenced in comment (with 95.46 miles, and a heading that says Tribs), and the pollutant of concern is "unknown" with nutrients as a suspected impairment, and could include sediment when a Subbasin Assessment is done. The term "physical substrate habitat alterations" unfortunately still appears in Section 5 listings. As KEA is aware, physical substrate habitat alterations was determined in legal negotiations as a non-pollutant for which TMDL load calculations could not be developed. DEQ does have a Section 4c in the 2008 IR, which are the water bodies with a non-pollutant listing. The 1998 §303(d) list did not include "nutrients" as a pollutant of concern for Coeur d'Alene Lake. There is some confusion if "nutrients" was listed for 17010303PN001L_0L in 2002 and 2004 IR's. In the draft 2008 IR, 17010303PN001L_0L is not listed in Section 5. Given the data that DEQ has in hand, including most of the data set from the USGS 2003 – 2006 lake study, DEQ does not believe that the data warrants a nutrient entry on the §303(d) list for the northern pool of State jurisdiction waters. Total phosphorus and total nitrogen levels remain low, and dissolved oxygen profiles within the hypolimnion during summer stratification remain above 6 mg/L DO. DEQ does not have sufficient information within nearshore areas of northern bays to make a statement that the Standards nutrient narrative criteria is being violated, or is impairing beneficial uses. Turner Creek and Carlin Creek are not part of the 17010303PN001_02 stream group. In the DEQ Coeur d'Alene Lake and River (17010303) Subbasin Assessment and TMDL (1999), both Turner Creek and Carlin Creek were assessed as Full Support of beneficial uses, and recommended for §303(d) de-listing. In the draft 2008 IR, Carlin Creek

			surveys available for public inspection? *The December 23, 1999 document on page seven also shows Thompson Creek as being listed for non-metallic pollutants in sub-basin 1701303. It is listed for habitat alteration and sediment in Table 1 on page seven. Thompson Creek is not listed on the 2008 IR. Does DEQ have survey data less than 5 years old that indicates there are no pollutants such as sediment or nutrients that are moving through Thompson Creek and into Coeur d'Alene Lake?* *Additionally, has DEQ undertaken water quality inspections in any waterbodies on the east side of the Lake that are downstream of the new developments that include housing units and golf courses?* *We also have a question as to the status of the following Creeks located on the west side of Coeur d'Alene Lake; Lyle Creek, Scott Creek, Stinson Creek, and Bellgrove Creek. Is there current DEQ water quality data for any of these Creeks?* *The Final 2008 IR should include information that lists all water bodies draining directly drain into the Lake that have water quality data less than five years old that supports a finding no nutrients and/or sediment are entering the Lake.*	has been de-listed (see IR Section 2). Turner Creek is listed in Section 5 of the 2008 IR. DEQ believes that this listing is a mistake, and Turner Creek should be de-listed along with Carlin (should be in Section 2). DEQ does not have data less than 5 years old for these two streams. In 2006, DEQ sent a BURP crew to Carlin Creek, but it was dry. In 2006, DEQ selected Turner Creek for BURP monitoring, no access was granted. DEQ is planning to send another BURP crew to these sites within the next two field seasons (2008-2009). Regarding Thompson Creek; on page 31, Table 16 of the 1999 TMDL it was determined that Thompson Creek was not impaired by excess sediment, and a TMDL was not developed. In the draft 2008 IR Section 5, there is a Thompson Lake, 17010303PN025_02, 6.13 acres, with physical substrate habitat alterations and sediment as pollutants of concern. This listing is an error. The code for Thompson Lake is 17010303PN025L_0L, and it is a water body that DEQ has not assessed (should be in Section 3). The Section 5 listing of 17010303PN025_02 should have said Thompson Creek with 6.13 miles. And, Thompson Creek should not be in Section 5, it should be in Section 2 as de-listed. DEQ does not have data less than 5 years old for Thompson Creek. In 2006, DEQ selected Thompson Creek for BURP monitoring, but no access was granted. DEQ is planning to send another BURP crew to Thompson Creek within the next two field seasons (2008-2009). DEQ has conducted a limited number of turbidity tests from groundwater springs down-gradient of an east side golf course development. In regard to the streams listed in your comment (Lyle, Scott, Stinson, and Bellgrove): Stinson Creek was visited by our BURP crew in 2004, but it was dry; and DEQ has conducted bacteria sampling on Bellgrove Creek which resulted in its' listing on the 2008 draft IR (under Fighting Creek). DEQ is in the process of a 5-year review of the Coeur d'Alene Lake and River (17010303) Subbasin Assessment and TMDL (1999), which will include collection of additional data within the Coeur d'Alene Lake Subbasin as an update to the Subbasin Assessment. DEQ is also considering other streams within the Subbasin for monitoring. These streams are listed, but not part of the 1999 TMDL, or have experienced considerable land-use changes in the last 5 years.

				DEQ does not quite understand your last comment. Of course, there are no natural situations where a stream would be absent of nutrients and/or sediment loading to a lake.
318.	ID17010104PN004_02	17	*Boundary County is having a difficult time understanding why Blue Joe Creek is not being placed in the 4b category. This is supposed to be a category that fits what has occurred in the area. EPA took control of the cleanup for metals, and worked many months to improve the stream. My community has worked many long days over many years addressing the issues regarding the Kootenai and Moyie Basins, and to have this area not be moved to the proper classification is beyond understanding. The United States Forest Service is using this project in their presentations as an example of how the reclamation process and cleanup has allowed this stream to qualify for 4b designation. There is nothing more that can be done presently to improve the metals, or EPA would be accomplishing this. I understand this may be an administrative decision and would like some verification as to why this stream does not qualify for the designation.*	DEQ's effort to document a Section 4(b) justification for the metals impairing Blue Joe Creek fell short as additional documentation from the CERCLA removal action on Blue Joe Creek was disclosed by EPA. Here is an excerpt from the 2004 Removal Action report: "…surface water and groundwater treatment was not addressed as part of the Removal Action. It is anticipated that beneficial effects from the completed work will result in minimizing the availability of source metals contamination. The IDEQ will address water quality issues as part of its TMDL program by establishing metals load limits for Blue Joe Creek in 2005. The TMDL will require, by law, a TMDL implementation plan that may require additional projects aimed at reducing metals loading. [....] Compliance with the TMDL plan will be the responsibility of CLI, the property owner (EPA 2003)." -Removal Action Report Continental Mine. USEPA. January, 2004. Based on the above disclosure it is clear that Blue Joe needs to be in Section 5 and a TMDL does need to be developed unless the USFS or the land owner can provide Tier 1 data indicating that Blue Joe Creek meets Idaho WQS (WQS) and supports it's beneficial uses whereby a de-listing to Section 2 of the IR can be proposed. Alternatively, if interested parties can demonstrate a clear downward trend in metals concentrations and that remedial actions on Blue Joe Creek will result in WQS being attained and the beneficial uses being supported in a reasonable timeframe then a 4(b) justification could be proposed for the 2010 IR.
319.	ID17010104PN004_02	18	*The Kootenai Tribe of Idaho requests IDEQ reconsider the listing of Blue Joe Creek under Section 5 of the Integrated Report. This section of stream was the center of an EPA CERCLA cleanup to address the pollutants and is currently receiving extensive monitoring (as outlined under the EPA project). EPA provided an On-Scene Coordinator, Project Engineer, and Construction Manager for the project -- assuming full control for the remediation actions. The work was done in partnership with the U.S. Forest Service and the Tribe provided*	DEQ's effort to document a Section 4(b) justification for the metals impairing Blue Joe Creek fell short as additional documentation from the CERCLA removal action on Blue Joe Creek was disclosed by EPA. Here is an excerpt from the 2004 Removal Action report: "…surface water and groundwater treatment was not addressed as part of the Removal Action. It is anticipated that beneficial effects from the completed work will result in minimizing the availability of source metals contamination. The IDEQ will address water quality issues as part of its TMDL program by establishing metals load limits for Blue Joe Creek in 2005. The TMDL will require, by law, a TMDL

			monitors to the project. It is clearly appropriate that Blue Joe Creek should be listed under Section 4b of the Integrated Report. The Kootenai Tribe strongly urges IDEQ to make this critical change. EPA data & project follow up should clearly indicate that no further actions are required.	implementation plan that may require additional projects aimed at reducing metals loading. [....] Compliance with the TMDL plan will be the responsibility of CLI, the property owner (EPA 2003)." -Removal Action Report Continental Mine. USEPA. January, 2004. Based on the above disclosure it is clear that Blue Joe needs to be in Section 5 and a TMDL does need to be developed unless the USFS or the land owner can provide Tier 1 data indicating that Blue Joe Creek meets Idaho WQS (WQS) and supports it's beneficial uses whereby a de-listing to Section 2 of the IR can be proposed. Alternatively, if interested parties can demonstrate a clear downward trend in metals concentrations and that remedial actions on Blue Joe Creek will result in WQS being attained and the beneficial uses being supported in a reasonable timeframe then a 4(b) justification could be proposed for the 2010 IR.
320.		19	*We are very alarmed that the draft 2008 Integrated 303(d)/ 305(d) Report lists more than 100 pages of impaired waters (303(d) list). Many of the streams and lakes have been listed as impaired since 2002, and yet many of these Idaho water bodies are listed as unknown pollutant. This lack of investigation and proof of impairment after more than six years is inexcusable for such important public trust resources. Perhaps, this indicates the U.S. Environmental Protection Agency should impose stricter controls and authority in the State of Idaho to help protect our surface water quality and the aquatic biota dependent on it.* *While there are more than 130 pages of streams being dropped by IDEQ from the 303(d) list, this is not what appears on the surface to necessarily reflect cleaner streams in Idaho and designated uses, including suitable habitat for threatened and endangered aquatic biota, being met. Rather, many of the streams and lake dropped are apparently being removed from the list because administratively a TMDL has been put in place, without any data or proof that the designated use is being met and/or the water quality has actually*	"Unknown" is a legitimate pollutant documented in EPA policy and guidance documents for the IR. DEQ has not listed any AUs for "unknown" since 2002. In fact EPA changed all the categorical pollutants to "unknown" during the 2002 IR approval process. Those AUs showing "unknown" as a pollutant were previously listed for one of the following causes: Metals Pesticides Nutrients These causes can be found in the cause comments. DEQ disagrees that waters impaired by pollution must be listed in Section 5. Section 303d requires TMDLs be calculated for "pollutants". Flow alteration for example, is not a pollutant as defined by the CWA. See §502(6) and EPA Guidance for 2006 Assessment, Listing and Reporting requirements pursuant to §303(d), 305(b) and 314 of CWA (July 29, 2005). The sole purpose of Section 5 is to identify and prioritize Assessment Units for TMDL development. Section 5 is reserved for impaired Assessment Units that are due a Total Maximum Daily Load (TMDL). Circumstances exist that can impair an Assessment Unit but for which DEQ cannot write a TMDL.

			improved. This is shocking and totally unacceptable to our group and its members. *It appears that many of the stream segments are being dropped because of water flow impairments and habitat alterations, which are not considered as pollutants by IDEQ. However, it is well known and accepted in the scientific community that when a stream's flow is impeded and/or its habitat altered, such as overhanging banks and riparian vegetation, that surface water quality is degraded and designated uses such as coldwater biota and salmonid spawning can no longer be supported by the reach. Just because an individual pollutant is not easily identified and a TMDL cannot be simplistically imposed, is not a good enough reason to allow a stream or lake that is not supporting its designated use to be dropped from the 303(d) list and be shoved aside from streams needed priority attention and restoration.* *In other cases, just because a pollutant has not been identified, possibly because of a lack of water quality sampling and monitoring or limitations of IDEQ funding and staff, does not mean it is no longer impaired. Many of the segments dropped in the Upper Salmon River Basin, East Fork Salmon River Watershed, Pahsimeroi River Watersheds, Lemhi River Watershed, Panther Creek Watershed, Camas Creek Watershed, Big Lost River Basin, Little Lost River Basin, Wood River Basin, and others suffer impairments from poor land management including fecal coliform bacteria, increased water temperatures, increased eutrophication by the addition of ammonia, nitrates, and phosphates into surface waters and wetlands, increased siltation increased turbidity, and decreased dissolved oxygen concentrations directly attributable to livestock grazing, watering, and trailing in and along Idaho's streams and lake shores.* *As rivers and streams such as the Bruenau and Owyhee*	These circumstances include: 1) An EPA established TMDL; 2) a Section 4(b) justification; or 3) impairment due to a non-pollutant (flow or habitat alteration). AUs that fall into one of those 3 situations are placed in Section 4 of the IR. Section 4 is defined as AUs with impaired beneficial use(s) and/or which fail to meet WQS. Two points should be emphasized here, first AU-pollutant combinations are independent of one another and therefore an AU can appear in both Section 4 and Section 5. Second is that when an AU is found in Section 4 it means that the AU is still impaired. It is not until the TMDL or other remedial plan is implemented that DEQ will re-monitor and assess whether the AU continues to be impaired. When DEQ can demonstrate that the AU supports beneficial uses and meets WQS the AU will be moved into Section 2. Impairment by flow and/or habitat alteration is not suitable for TMDL development. Almost all AUs in Section 4c are impaired by other causes such as sediment.. TMDLs are then developed for those pollutants best suited for TMDL development. Implementing those TMDLs can often work to address flow and habitat alteration impairments.

			lose flows and are dropped from your 303(d) list, they also lose their natural capacity to handle pollutants from grazing cattle and sheep, such as increased water temperatures and decreased dissolved oxygen concentrations. These streams historically supported anadromous salmonids and native redband trout populations, which are also declining. Your reclassifications of streams with altered flows and habitat does not reflect their loss of resiliency to pollution inputs and their lack of support for designated uses and historic uses, including salmonid spawning.	
321.	Little Salmon River ID17060210SL001_05	20	*The EPA approved the Little Salmon River TMDL in March, 2006. However, the Little Salmon River is still listed in Section 5 for flow alteration and sediment. Shouldn't it be listed in Section 4a since it has an approved TMDL?*	The Little Salmon River should be removed from Section 5 of the list for sediment. It should be placed in Section 4c for physical habitat alteration. The **Little Salmon River from Round Valley Creek to the mouth** showed support of beneficial uses. However, DEQ was unable to analyze the effect of coarse sediment in the system. Several government agencies including USBR and the BLM have pointed out that coarse sediment transported as part of the 1997 flood is potentially reducing salmonid spawning in places and leading to channel aggradation. DEQ proposes to list the Little Salmon River from Round Valley Creek to the mouth for habitat alteration and delist for sediment. This listing is on the basis of DEQ Beneficial Use Reconnaissance Program (BURP) scores that did not indicate impairment and low suspended sediment data. However, the listing for habitat alteration is in recognition that the system was changed due to the construction of the highway and the channel remains constricted, leading to potential coarse sediment loading problems. The state of Idaho's antidegradation policy applies in this case and existing uses must be maintained and protected from any activities that would result in human caused excess sediment delivery to the system.
322.	General	21	*The Tribe objects to IDEQ's inclusion of waters within the exterior boundaries of the Coeur d'Alene Indian Reservation ("Reservation waters") within the 2008 Draft Report's assessment units and determinations of beneficial use status, as the State of Idaho is without authority to assess or impose such determinations on*	Waters on the 1998 303(d) List, 2002 & 2008 Integrated Reports may be partially or wholly within Indian reservations, on lands held by tribal members subject to a restriction on alienation, and/or held by the United States in trust for Indian Tribes. The draft Integrated Report was accompanied by a map that

			Reservation waters. The Tribe similarly objected to inclusion of Reservation waters in IDEQ's 2002 Integrated Report and notes that IDEQ's 2008 Draft Report tacitly acknowledges limits on its regulatory authority over Reservation waters by its omission of those portions of Upper Hangman Creek within the Reservation. *The Tribe has good reasons for this objection, both legal and technical. As you know, the Tribe's federally approved constitution extends authority over all lands and waters within the Reservation. Pursuant to that authority, the Tribe has promulgated water quality standards to preserve and protect the federal purposes of all Reservation waters. EPA has approved the Tribe to administer Clean Water Act Section 106 (monitoring program) and Section 319 (non-point source program) on all Reservation waters. The Tribe also has federal approval to implement Clean Water Act Sections 303(c) (water quality standards) and 401 (water quality certifications) on those navigable waters of Coeur d'Alene Lake and the St. Joe River within present Reservation boundaries. To the degree to which the Tribe presently lacks federal approval to administer Clean Water Act programs on remaining Reservation waters, the United States has made clear that it holds the authority to administer these programs on those waters, not the state of Idaho. Accordingly EPA maintains a list of waters within the reservation which are considered degraded under section 303(d) of the CWA and this list is separate from that of the state of Idaho's. EPA also recognized that the Tribes water quality standards will guide the Agency decisions under the Clean Water Act with respect to those Reservation waters that the Tribe has not been approve to administer under the Act (EPA, Coeur d'Alene Tribe TAS Q and A, August 2005).* *The Tribe's objections are also justified on other regulatory and technical grounds.* *First, IDEQ's inclusion of Reservation waters in the 2008 Draft Report is inconsistent with EPA's 2007*	showed the Tribal reservation boundaries recognized by the EPA and other federal agencies. AUs were edited to end and/or begin at the federally-recognized reservation boundaries, and some waters were accordingly identified as tribal waters. DEQ has determined, however, that splitting AUs in this manner makes some of the beneficial use calls incorrect or inconsistent with the WBAGII method of assessment. For example, when some of the AUs were split, there was no longer a sampling or assessment site within the boundaries of the AU that would support the beneficial use determination. In order to remedy this situation, DEQ has removed the reservation boundaries from the map, and the AUs are now kept intact even where they may cross Tribal reservation boundaries. DEQ has instead included a new Appendix that identifies those waters that may be within the federally recognized Tribal reservations. DEQ's actions with respect to the integrated report and such waters, including the identification of tribal waters and the description of reservation boundaries, do not constitute a determination, waiver, admission, or statement on the part of the State of Idaho with respect to jurisdiction over such waters or the boundaries of any tribal reservation. The status of the AUs within the federally-recognized reservation boundaries was maintained with respect to the 1998 303(d) unless there was an EPA approved TMDL. The 2008 Draft Report does not include beneficial use status assessments made from data obtained within the boundaries of the Coeur d' Alene Reservation. Idaho's database shows BURP sites within the Coeur d' Alene Reservation boundaries, but these sites do not have complete monitoring information and indicate either a visit or an evaluation to monitor was performed. Idaho Department of Environmental Quality does not have macro-invertebrate analysis results from samples collected in 2002 and 2003. Any assessments made on assessment units that transverse the Coeur d' Alene Reservation boundary are based on the BURP sites outside the Coeur d' Alene Reservation boundary. The assessments and delisting made on these Transboundary assessment units

			Clean Water Act Section 106 guidance to Tribes. Pursuant to that guidance, EPA requires the Tribe to submit integrated reports on all Reservation waters subject to federal review and approval. The Tribe has prepared integrated reports on all Reservation waters in each of the last four years and, consistent with EPA's 2007 guidance, the Tribe will be submitting to EPA the 2008 Tribal Waters Integrated Report for Federal review and approval. In view of this, IDEQ 2008 Draft Report appears to be duplicating the Tribe's preparation of an integrated report on Tribal waters. *Second, IDEQ's 2008 Draft Report assesses beneficial uses on Reservation waters based on data that may be unsuitable for such purposes. As you know, some of IDEQ's data on Reservations waters was obtained during the course of a collaborative Tribal and IDEQ training exercise that was authorized in 2002 and 2003 by the Tribe's Fisheries Program. The Tribe paid IDEQ's subcontractor, EcoAnalyists, for the costs of its services in analyzing the macro-invertebrate samples from assessment and reference sites on Reservation waters. The Tribe did not, however, authorize the subcontractor to forward or otherwise share the laboratory results from this sampling without prior Tribal approval, which has not been given. This (macro-invertebrate) data has not been considered by IDEQ in arriving at its beneficial use determinations on Reservation waters in the 2008 Draft Report. The Tribe therefore has serious doubts about the validity of IDEQ's beneficial use determinations. The Tribe also questions the appropriateness of IDEQ using other sampling data obtained through this Tribal-IDEQ training exercise, since that training was limited in scope and purposes and not conducted pursuant to a comprehensive sampling plan.* *Third, IDEQ's 2008 Draft Report already tacitly recognizes its lack of regulatory jurisdiction on certain Reservation waters. The Report identifies delisted assessment units on Reservation waters such as*	should be applied to the portion outside of the Coeur d' Alene Reservation Boundary.

			Moctileme and Little Hangman Creeks and notes that those "waters are not in state's jurisdiction" (pg 56 - 57, Public Comment Draft, 2008 Integrated Report: Delisted Assessment Units). *In summary, the Tribe has numerous well founded legal and technical reasons detailing how it is improper for IDEQ to assess or discuss waters within the Coeur d'Alene Reservation in this Draft 2008 Integrated Report*	
323.	ID16010204BR013_02	22	*Delisting because of flaws:The de-listing justification for Samaria Creek states that it is being de-listed because there were "flaws in the original listing," and that the stream is intermittent. No other information is cited. This is not an adequate justification for de-listing a stream.*	Segment and all attributes carried forward from 1998 list. Dry in 1996, 2003, and 2005 (see BURP information). Never assessed utilizing BURP protocol because it was dry every time. Irrigation not a factor.
324.	ID17040208SK001_05	22	*A TMDL was developed for the Portneuf River and approved by EPA in April, 2001. It is unclear from the de-listing rationale why this segment is being proposed to be de-listed for combined biota/habitat bioassessments. It states in the de-listing justification that the water is still impaired. If the TMDL was developed to address this impairment the de-listing should be 4a, waters with approved TMDL. However, if the TMDL did not address the issue of combined biota/habitat assessment the waters should remain listed.*	The TMDL addressed sediment and nutrients as identified pollutants; therefore, combined biota/habitat assessment and cause unknown are no longer relevant and have been removed from de-listings.
325.	ID17040210SK002_02	22	*DEQ is proposing to de-list Sublett Creek for sediment, fecal coliform and unknown because either "water quality standards are being met," or "flaws in original listing." However, this de-listing is based on a very limited data set that is presented on pages 73-76, table 31 of the Raft River TMDL.Based on the information provided on these waterbodies in the Raft River TMDL, they should remain listed in Category 5.*	This assessment unit is not part of Sublett Creek. It is part of the Raft River System. It is addressed in the Raft River TMDL pages 77 through 91. Delistings for ammonia, cause unknown have the same justification as Assessment unit ID17040210SK007_05.
326.	ID17040210SK008_04	22	*DEQ is proposing to de-list for unknown because "water quality standards are being met." However, data presented on pages 73-76, table 31 of the Raft River TMDL show total phosphorus concentrations above 0.1mg/L.DEQ is proposing to de-list for unknown because "water quality standards are being met." However, data presented on page 64, table 9 of the Raft River TMDL*	See page 84 of the Raft River SBA and TMDL. During the critical period TP values are below 0.1 mg/L. Also on an annual basis the average TP concentration was below the target selected and approved in the Raft River TMDL. Furthermore, the sediment and bacteria TMDLs for Raft River will address the early season run-off driven sediment load that was influencing the early season TP elevations, and the bacteria TMDL will address some of the other anthropogenic nutrient sources

			show total phosphorus concentrations above 0.1mg/L.Based on the information provided on these waterbodies in the Raft River TMDL, they should remain listed in Category 5.	within the watershed. There are no point sources within the watershed that would contribute TP to the system. However, the delisting reason WQS are being met may still be inappropriate as WQS and guidelines for sediment and bacteria are not being met. The delisting will be changed to other.
327.	ID17040210SK013_04	22	*DEQ is proposing to de-list for unknown because "water quality standards are being met." However, data presented on pages 73-76, table 31 of the Raft River TMDL show total phosphorus concentrations above 0.1mg/L.DEQ is proposing to de-list for unknown because "water quality standards are being met." However, data presented on page 64, table 9 of the Raft River TMDL show total phosphorus concentrations above 0.1mg/L.Based on the information provided on these waterbodies in the Raft River TMDL, they should remain listed in Category 5.*	Table 29 of the Raft River TMDl clearly shows that TP in the upper section of Raft River do not exceed 0.1 mg/L on an anuall basis. Early spring samples duirng the runoff period, but not within the critical period sometime do exceed 0.1mg/L. However, most of this TP is associated with sediment deliver to the system from unstable banks. The sediment TMDl approved by EPA will address this source of sediment within this AU and will also reduce the noncritical period TP. No changes will be made.
328.	ID17040210SK019_02	22	*DEQ is proposing to de-list Sublett Creek for sediment, fecal coliform and unknown because either "water quality standards are being met," or "flaws in original listing." However, this de-listing is based on a very limited data set that is presented on pages 73-76, table 31 of the Raft River TMDL.Based on the information provided on these waterbodies in the Raft River TMDL, they should remain listed in Category 5.*	The data set size is consistent with SBA's, TMDLs, and delistings written and approved throughout southern Idaho. The data collected and presented in figure 27 clearly shows that this system flows only during the irrigation season, hence the limited data collected and shown in table 31. See pages 93 and 96. Fecal coliform was originally delisted due to flaws in original listing. This was an error based on the data collected and presented in the Raft River SBA and TMDL pages 91-96 show that WQS are being met.
329.	ID17040210SK020_0L	22	*DEQ is proposing to de-list Sublett Reservoir for sediment and unknown because "water quality standards are being met." However, on page 101 of the Raft River TMDL there is a discussion about major non-point sources of sediment as rangelands, unstable banks and re-entrainment from the riverbed during drawdown and return to regular flows. Page 100, figure 36 notes DO problems at depth.Based on the information provided on these waterbodies in the Raft River TMDL, they should remain listed in Category 5.*	Unknow was delisted, as a result of TP TMDLs being completed for the reservoir and it's tributaries. The figure cited notes one low DO data point collected in one profile collected in May of 2001. follow up monitoring and additional profiles throughout the year dont support the contention that DO is a problem within the reservoir. Furthermore the TP TMDL will address any future DO problems at depth within the reservoir. The paragraph concerning major sediemnt sources was taken out of context and reads "the major sources of sediment are..." in the preceeding paragraphs DEQ clearly states that the is little sediment entering the system. The paragraph in question simply outlines what those sources are and does not imply impariment of benefical uses by said sediment

				from the use of the word major.
330.	ID17040220SK003_04	22	*Both of these have the same documentation for de-listing, yet Willow Creek justification states that water quality standards are being met and Beaver Creek justification is "other."*	Combined Biota indicated Willow Creek to be impaired, however combined biota is not a pollutant. The subbasin assessment determined the impairment to be caused by temperature, a temperature TMDL has been completed and a 5.2% reduction has been established. (See pg 169) Based on this infomation combined biota has been delisted, temperature has been added to Willow Creek, moved to 4A, and assigned the appropriate TMDL.
331.	ID17040220SK004_02	22	*Both of these have the same documentation for de-listing, yet Willow Creek justification states that water quality standards are being met and Beaver Creek justification is "other."*	Combined Biota indicated Beaver Creek to be impaired, however combined biota is not a pollutant. The subbasin assessment determined the impairment to be caused by temperature, a temperature TMDL has been completed and a 54.6% reduction has been established. (See pg 171) Based on this infomation combined biota has been delisted, temperature has been added to Beaver Creek, moved to 4A, and assigned the appropriate TMDL.
332.	ID17040221SK012L_0L	22	*The information detailed on page 131 of the Little Wood River Subbasin Assessment and TMDL show that the Reservoir is not impaired by fecal coliform. Why is the de-listing justification "other" and not "water quality standards being met?"*	The de-listing justification was changed to meeets WQS for both unknown and fecal coliform.
333.	ID17050101SW003_02	22	*De-listing because water quality standards being met:Browns, Sailor, and Deadman Creeks were discussed in the King Hill-CJ Strike Subbasin Assessment and TMDL. Creeks were noted to be dry when sampling was attempted, however sampling was not attempted in early spring or late fall which is a time when intermittent streams will typically have flow. It is not clear from the de-listing rationale or from the TMDL if any assessment of these waters was done by evaluating downstream conditions.*	DEQ will return this assessment unit to its prior location, pending early-spring sampling.
334.	ID17050101SW003_03	22	*De-listing because water quality standards being met:Browns, Sailor, and Deadman Creeks were discussed in the King Hill-CJ Strike Subbasin Assessment and TMDL. Creeks were noted to be dry when sampling was attempted, however sampling was not attempted in early spring or late fall which is a time when intermittent streams will typically have flow. It is not clear from the*	DEQ will return this assessment unit to its prior location, pending early-spring sampling.

			de-listing rationale or from the TMDL if any assessment of these waters was done by evaluating downstream conditions.	
335.	ID17050101SW003_04	22	*De-listing because water quality standards being met:Browns, Sailor, and Deadman Creeks were discussed in the King Hill-CJ Strike Subbasin Assessment and TMDL. Creeks were noted to be dry when sampling was attempted, however sampling was not attempted in early spring or late fall which is a time when intermittent streams will typically have flow. It is not clear from the de-listing rationale or from the TMDL if any assessment of these waters was done by evaluating downstream conditions.*	DEQ will return this assessment unit to its prior location, pending early-spring sampling.
336.	ID17050101SW004_02	22	*De-listing because water quality standards being met:Browns, Sailor, and Deadman Creeks were discussed in the King Hill-CJ Strike Subbasin Assessment and TMDL. Creeks were noted to be dry when sampling was attempted, however sampling was not attempted in early spring or late fall which is a time when intermittent streams will typically have flow. It is not clear from the de-listing rationale or from the TMDL if any assessment of these waters was done by evaluating downstream conditions.*	DEQ will return this assessment unit to its prior location, pending early-spring sampling.
337.	ID17050101SW004_03	22	*De-listing because water quality standards being met:Browns, Sailor, and Deadman Creeks were discussed in the King Hill-CJ Strike Subbasin Assessment and TMDL. Creeks were noted to be dry when sampling was attempted, however sampling was not attempted in early spring or late fall which is a time when intermittent streams will typically have flow. It is not clear from the de-listing rationale or from the TMDL if any assessment of these waters was done by evaluating downstream conditions.*	DEQ will return this assessment unit to its prior location, pending early-spring sampling.
338.	ID17050101SW006_02	22	*De-listing because water quality standards being met:Browns, Sailor, and Deadman Creeks were discussed in the King Hill-CJ Strike Subbasin Assessment and TMDL. Creeks were noted to be dry when sampling was attempted, however sampling was not attempted in early spring or late fall which is a time when intermittent streams will typically have flow. It is not clear from the*	DEQ will return this assessment unit to its prior location, pending early-spring sampling.

			de-listing rationale or from the TMDL if any assessment of these waters was done by evaluating downstream conditions.	
339.	ID17050101SW006_03	22	*De-listing because water quality standards being met:Browns, Sailor, and Deadman Creeks were discussed in the King Hill-CJ Strike Subbasin Assessment and TMDL. Creeks were noted to be dry when sampling was attempted, however sampling was not attempted in early spring or late fall which is a time when intermittent streams will typically have flow. It is not clear from the de-listing rationale or from the TMDL if any assessment of these waters was done by evaluating downstream conditions.*	DEQ will return this assessment unit to its prior location, pending early-spring sampling.
340.	ID17050101SW006_04	22	*De-listing because water quality standards being met:Browns, Sailor, and Deadman Creeks were discussed in the King Hill-CJ Strike Subbasin Assessment and TMDL. Creeks were noted to be dry when sampling was attempted, however sampling was not attempted in early spring or late fall which is a time when intermittent streams will typically have flow. It is not clear from the de-listing rationale or from the TMDL if any assessment of these waters was done by evaluating downstream conditions.*	DEQ will return this assessment unit to its prior location, pending early-spring sampling.
341.	ID17050101SW008_02	22	*De-listing because water quality standards being met:Browns, Sailor, and Deadman Creeks were discussed in the King Hill-CJ Strike Subbasin Assessment and TMDL. Creeks were noted to be dry when sampling was attempted, however sampling was not attempted in early spring or late fall which is a time when intermittent streams will typically have flow. It is not clear from the de-listing rationale or from the TMDL if any assessment of these waters was done by evaluating downstream conditions.*	DEQ will return this assessment unit to its prior location, pending early-spring sampling.
342.	ID17050101SW008_03	22	*De-listing because water quality standards being met:Browns, Sailor, and Deadman Creeks were discussed in the King Hill-CJ Strike Subbasin Assessment and TMDL. Creeks were noted to be dry when sampling was attempted, however sampling was not attempted in early spring or late fall which is a time when intermittent streams will typically have flow. It is not clear from the*	DEQ will return this assessment unit to its prior location, pending early-spring sampling.

			de-listing rationale or from the TMDL if any assessment of these waters was done by evaluating downstream conditions.	
343.	ID17050102SW008_02	22	*Sugar Creek is discussed in the Bruneau River Subbasin Assessment and TMDL. In the TMDL discussion of Sugar Creek it is noted that Sugar Creek was listed in error. If this is the case, DEQ should be de-listing because of "flaws in original listing," not because "water quality standards are being met." and justify the delisting based on the flaw.*	Changes were made to reflect this comment.
344.	ID17050102SW008_03	22	*Sugar Creek is discussed in the Bruneau River Subbasin Assessment and TMDL. In the TMDL discussion of Sugar Creek it is noted that Sugar Creek was listed in error. If this is the case, DEQ should be de-listing because of "flaws in original listing," not because "water quality standards are being met." and justify the delisting based on the flaw.*	Changes were made to reflect this comment.
345.	ID17050102SW022_02	22	*Cougar Creek is discussed in the Bruneau River Subbasin Assessment and TMDL. Cougar Creek was dry when DEQ when to sample it, however it was assessed based on downstream conditions. EPA supports the downstream evaluation as a potential indicator of determining use support for intermittent streams, however since DEQ does not have an assessment protocol for intermittent streams we recommend that these waters remain listed*	DEQ will return this assessment unit to its prior location, pending early-spring sampling.
346.	ID17050102SW022_02	22	*Pickett, Brown, McBride, Hardtrigger, Birch, Corder, Rabbit and Cougar Creeks are discussed in the Mid Snake Succor Creek Subbasin Assessment and TMDL. Data is presented in the TMDL that shows both Hardtrigger and Pickett have at some period had flow above 1cfs. The other creeks had less then 1 cfs or no flow when DEQ attempted sampling. All of these creeks are being proposed for de-listing because "water quality standards are being met," however from the de-listing justification and the information presented in the TMDL it does not appear that these waters were assessed.*	DEQ will return this assessment unit to its prior location, pending early-spring sampling.
347.	ID17050102SW022_03	22	*Cougar Creek is discussed in the Bruneau River Subbasin Assessment and TMDL. Cougar Creek was dry when DEQ when to sample it, however it was assessed based on downstream conditions. EPA supports the downstream*	DEQ will return this assessment unit to its prior location, pending early-spring sampling.

			evaluation as a potential indicator of determining use support for intermittent streams, however since DEQ does not have an assessment protocol for intermittent streams we recommend that these waters remain listed	
348.	ID17050102SW022_03	22	*Pickett, Brown, McBride, Hardtrigger, Birch, Corder, Rabbit and Cougar Creeks are discussed in the Mid Snake Succor Creek Subbasin Assessment and TMDL. Data is presented in the TMDL that shows both Hardtrigger and Pickett have at some period had flow above 1cfs. The other creeks had less then 1 cfs or no flow when DEQ attempted sampling. All of these creeks are being proposed for de-listing because "water quality standards are being met," however from the de-listing justification and the information presented in the TMDL it does not appear that these waters were assessed.*	DEQ will return this assessment unit to its prior location, pending early-spring sampling.
349.	ID17050102SW025_02	22	*Poison Creek is discussed in the Bruneau River Subbasin Assessment and TMDL. Poison Creek was dry when DEQ when to sample it, however it was assessed based on downstream conditions. EPA supports the downstream evaluation as a potential indicator of determining use support for intermittent streams, however since DEQ does not have an assessment protocol for intermittent streams we recommend that these waters remain listed*	DEQ will return this assessment unit to its prior location, pending early-spring sampling.
350.	ID17050102SW025_03	22	*Poison Creek is discussed in the Bruneau River Subbasin Assessment and TMDL. Poison Creek was dry when DEQ when to sample it, however it was assessed based on downstream conditions. EPA supports the downstream evaluation as a potential indicator of determining use support for intermittent streams, however since DEQ does not have an assessment protocol for intermittent streams we recommend that these waters remain listed*	DEQ will return this assessment unit to its prior location, pending early-spring sampling.
351.	ID17050103SW004_02	22	*Pickett, Brown, McBride, Hardtrigger, Birch, Corder, Rabbit and Cougar Creeks are discussed in the Mid Snake Succor Creek Subbasin Assessment and TMDL. Data is presented in the TMDL that shows both Hardtrigger and Pickett have at some period had flow above 1cfs. The other creeks had less then 1 cfs or no flow when DEQ attempted sampling. All of these creeks are being proposed for de-listing because "water quality standards are being met," however from the de-listing justification*	DEQ will return this assessment unit to its prior location, pending early-spring sampling.

			and the information presented in the TMDL it does not appear that these waters were assessed.	
352.	ID17050103SW004_03	22	*Pickett, Brown, McBride, Hardtrigger, Birch, Corder, Rabbit and Cougar Creeks are discussed in the Mid Snake Succor Creek Subbasin Assessment and TMDL. Data is presented in the TMDL that shows both Hardtrigger and Pickett have at some period had flow above 1cfs. The other creeks had less then 1 cfs or no flow when DEQ attempted sampling. All of these creeks are being proposed for de-listing because "water quality standards are being met," however from the de-listing justification and the information presented in the TMDL it does not appear that these waters were assessed.*	DEQ will return this assessment unit to its prior location, pending early-spring sampling.
353.	ID17050103SW008_02	22	*Pickett, Brown, McBride, Hardtrigger, Birch, Corder, Rabbit and Cougar Creeks are discussed in the Mid Snake Succor Creek Subbasin Assessment and TMDL. Data is presented in the TMDL that shows both Hardtrigger and Pickett have at some period had flow above 1cfs. The other creeks had less then 1 cfs or no flow when DEQ attempted sampling. All of these creeks are being proposed for de-listing because "water quality standards are being met," however from the de-listing justification and the information presented in the TMDL it does not appear that these waters were assessed.*	DEQ will return this assessment unit to its prior location, pending early-spring sampling.
354.	ID17050103SW016_02	22	*Pickett, Brown, McBride, Hardtrigger, Birch, Corder, Rabbit and Cougar Creeks are discussed in the Mid Snake Succor Creek Subbasin Assessment and TMDL. Data is presented in the TMDL that shows both Hardtrigger and Pickett have at some period had flow above 1cfs. The other creeks had less then 1 cfs or no flow when DEQ attempted sampling. All of these creeks are being proposed for de-listing because "water quality standards are being met," however from the de-listing justification and the information presented in the TMDL it does not appear that these waters were assessed.*	DEQ will return this assessment unit to its prior location, pending early-spring sampling.
355.	ID17050103SW016_03	22	*Pickett, Brown, McBride, Hardtrigger, Birch, Corder, Rabbit and Cougar Creeks are discussed in the Mid Snake Succor Creek Subbasin Assessment and TMDL. Data is presented in the TMDL that shows both Hardtrigger and Pickett have at some period had flow above 1cfs. The*	DEQ will return this assessment unit to its prior location, pending early-spring sampling.

			other creeks had less then 1 cfs or no flow when DEQ attempted sampling. All of these creeks are being proposed for de-listing because "water quality standards are being met," however from the de-listing justification and the information presented in the TMDL it does not appear that these waters were assessed.	
356.	ID17050103SW019_02	22	*Pickett, Brown, McBride, Hardtrigger, Birch, Corder, Rabbit and Cougar Creeks are discussed in the Mid Snake Succor Creek Subbasin Assessment and TMDL. Data is presented in the TMDL that shows both Hardtrigger and Pickett have at some period had flow above 1cfs. The other creeks had less then 1 cfs or no flow when DEQ attempted sampling. All of these creeks are being proposed for de-listing because "water quality standards are being met," however from the de-listing justification and the information presented in the TMDL it does not appear that these waters were assessed.*	DEQ will return this assessment unit to its prior location, pending early-spring sampling.
357.	ID17050103SW019_03	22	*Pickett, Brown, McBride, Hardtrigger, Birch, Corder, Rabbit and Cougar Creeks are discussed in the Mid Snake Succor Creek Subbasin Assessment and TMDL. Data is presented in the TMDL that shows both Hardtrigger and Pickett have at some period had flow above 1cfs. The other creeks had less then 1 cfs or no flow when DEQ attempted sampling. All of these creeks are being proposed for de-listing because "water quality standards are being met," however from the de-listing justification and the information presented in the TMDL it does not appear that these waters were assessed.*	DEQ will return this assessment unit to its prior location, pending early-spring sampling.
358.	ID17050103SW019_04	22	*Pickett, Brown, McBride, Hardtrigger, Birch, Corder, Rabbit and Cougar Creeks are discussed in the Mid Snake Succor Creek Subbasin Assessment and TMDL. Data is presented in the TMDL that shows both Hardtrigger and Pickett have at some period had flow above 1cfs. The other creeks had less then 1 cfs or no flow when DEQ attempted sampling. All of these creeks are being proposed for de-listing because "water quality standards are being met," however from the de-listing justification and the information presented in the TMDL it does not appear that these waters were assessed.*	DEQ will return this assessment unit to its prior location, pending early-spring sampling.
359.	ID17050103SW021_02	22	*Pickett, Brown, McBride, Hardtrigger, Birch, Corder,*	DEQ will return this assessment unit to its prior location, pending early-

			Rabbit and Cougar Creeks are discussed in the Mid Snake Succor Creek Subbasin Assessment and TMDL. Data is presented in the TMDL that shows both Hardtrigger and Pickett have at some period had flow above 1cfs. The other creeks had less then 1 cfs or no flow when DEQ attempted sampling. All of these creeks are being proposed for de-listing because "water quality standards are being met," however from the de-listing justification and the information presented in the TMDL it does not appear that these waters were assessed.	spring sampling.
360.	ID17050103SW021_03	22	*Pickett, Brown, McBride, Hardtrigger, Birch, Corder, Rabbit and Cougar Creeks are discussed in the Mid Snake Succor Creek Subbasin Assessment and TMDL. Data is presented in the TMDL that shows both Hardtrigger and Pickett have at some period had flow above 1cfs. The other creeks had less then 1 cfs or no flow when DEQ attempted sampling. All of these creeks are being proposed for de-listing because "water quality standards are being met," however from the de-listing justification and the information presented in the TMDL it does not appear that these waters were assessed.*	DEQ will return this assessment unit to its prior location, pending early-spring sampling.
361.	ID17050103SW021_04	22	*Pickett, Brown, McBride, Hardtrigger, Birch, Corder, Rabbit and Cougar Creeks are discussed in the Mid Snake Succor Creek Subbasin Assessment and TMDL. Data is presented in the TMDL that shows both Hardtrigger and Pickett have at some period had flow above 1cfs. The other creeks had less then 1 cfs or no flow when DEQ attempted sampling. All of these creeks are being proposed for de-listing because "water quality standards are being met," however from the de-listing justification and the information presented in the TMDL it does not appear that these waters were assessed.*	DEQ will return this assessment unit to its prior location, pending early-spring sampling.
362.	ID17050103SW025_02	22	*Pickett, Brown, McBride, Hardtrigger, Birch, Corder, Rabbit and Cougar Creeks are discussed in the Mid Snake Succor Creek Subbasin Assessment and TMDL. Data is presented in the TMDL that shows both Hardtrigger and Pickett have at some period had flow above 1cfs. The other creeks had less then 1 cfs or no flow when DEQ attempted sampling. All of these creeks are being proposed for de-listing because "water quality standards*	DEQ will return this assessment unit to its prior location, pending early-spring sampling.

			are being met," however from the de-listing justification and the information presented in the TMDL it does not appear that these waters were assessed.	
363.	ID17050103SW026_02	22	*Pickett, Brown, McBride, Hardtrigger, Birch, Corder, Rabbit and Cougar Creeks are discussed in the Mid Snake Succor Creek Subbasin Assessment and TMDL. Data is presented in the TMDL that shows both Hardtrigger and Pickett have at some period had flow above 1cfs. The other creeks had less then 1 cfs or no flow when DEQ attempted sampling. All of these creeks are being proposed for de-listing because "water quality standards are being met," however from the de-listing justification and the information presented in the TMDL it does not appear that these waters were assessed.*	DEQ will return this assessment unit to its prior location, pending early-spring sampling.
364.	ID17050107SW008_04	22	*Information cited on page 60 of the Upper Owyhee TMDL references Battle Creek and Shoofly Creek, not the North Fork Owyhee and Juniper Creek. DEQ needs to cite in the de-listing documentation on which page or pages in the TMDL the information supporting the de-listing is located.*	Good point. The correct documentation is from the 2000 North and Middle Fork Owyhee TMDL, page 61: (approved Feb 2000). 'The listing of bacteria and the non-support of primary contact recreation within the North Fork Owyhee River was based on a one-time sampling event by the BLM in July 1997 where a result of 1100 Fecal coliform per 100ml of river water was discovered. No other samples collected by IDEQ or the BLM on the North Fork Owyhee have shown results that exceed the Idaho WQS for primary contact recreation and secondary contact recreation,. Therefore, additional water chemistry samples were taken during August and September of 1999 in order to determine the current level of impairment due to bacteria for the Idaho and Oregon portions of the North Fork Owyhee River. These additional samples did non show exceedances of current Idaho or Oregon WQS for bacteria. Therefore, a reduction to the current bacteria load is not required at this time. However, under the Idaho WQS for antidegradation (IDAPA 16.01.02.051), the water quality within these drainages must remain adequate to protect the exisdting uses fully. Therefore, there can be no increases to the current bacteria load within these drainages in amounts that would impair the existing uses.
365.	ID17050114SW001_06	22	*DEQ has proposed de-list the Lower Boise River from Middleton to the mouth for nutrients (total phosphorus). DEQ contends that the Lower Boise River is no longer impaired by nutrients. However, data indicate that nutrients in the Lower Boise impair beneficial use support in the River, contribute to the impairment of the beneficial*	DEQ has proposed de-list the Lower Boise River from Middleton to the mouth for nutrients (total phosphorus). DEQ contends that the Lower Boise River is no longer impaired by nutrients. However, data indicate that nutrients in the Lower Boise impair beneficial use support in the River, contribute to the impairment of the beneficial uses of the Snake River and Brownlee Reservoir and exceed EPA criteria recommendations

			uses of the Snake River and Brownlee Reservoir and exceed EPA criteria recommendations for nutrients. EPA has reviewed DEQ's documentation and justification for de-listing and finds that the existing and readily available information is not consistent with this conclusion and instead recommends that the Lower Boise should remain 303(d) listed for nutrients.In considering DEQ's de-listing rationale, EPA reviewed Idaho's water quality standards that address nutrients. Idaho Administrative Code (IDAPA 58.01.02-200.05, 06, 07) outlines the following water quality criteria that pertain to nutrients:05. Floating, Suspended or Submerged Matter. Surface waters of the state shall be free from floating, suspended, or submerged matter of any kind in concentrations causing nuisance or objectionable conditions or that may impair designated beneficial uses. This matter does not include suspended sediment produced as a result of nonpoint source activities. (8-24-94)06. Excess 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. (8-24-94) 07. Oxygen-Demanding Materials. Surface waters of the state shall be free from oxygen-demanding materials in concentrations that would result in an anaerobic water condition. (7-1-93) Many states have narrative criteria for nutrients that must be interpreted to determine if beneficial uses are supported. While Idaho has not developed specific guidance to interpret their criteria, they have developed the River Macroinvertebrate Index (IDEQ, 2002)and use other parameters (DO, chlorophyll a, etc) and the narrative criteria above, to determine if nutrient problems are impairing beneficial use support. EPA has developed Ambient Water Quality Criteria Recommendations (EPA 822-B-0006) that present nutrient criteria for rivers and streams in Nutrient Ecoregion III (the Ecoregion which includes the Lower Boise). The recommendations are that for minimally impacted rivers and streams in Ecoregion III, the reference condition which is protective of designated uses and allows management flexibility is 0.010-0.055 mg/l total phosphate	for nutrients. EPA has reviewed DEQ's documentation and justification for de-listing and finds that the existing and readily available information is not consistent with this conclusion and instead recommends that the Lower Boise should remain 303(d) listed for nutrients. Response: DEQ will be responding to EPA's assertion that nutrients impair beneficial use support in the River on a point by point basis in the text below. We note that contribution to impairment in downstream reaches is not a basis for listing. We also note that DEQ is not bound by EPA criteria recommendations for nutrients. In considering DEQ's de-listing rationale, EPA reviewed Idaho's water quality standards that address nutrients. Idaho Administrative Code (IDAPA 58.01.02-200.05, 06, 07) outlines the following water quality criteria that pertain to nutrients: 05. Floating, Suspended or Submerged Matter. Surface waters of the state shall be free from floating, suspended, or submerged matter of any kind in concentrations causing nuisance or objectionable conditions or that may impair designated beneficial uses. This matter does not include suspended sediment produced as a result of nonpoint source activities. (8-24-94) 06. Excess 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. (8-24-94) 07. Oxygen-Demanding Materials. Surface waters of the state shall be free from oxygen-demanding materials in concentrations that would result in an anaerobic water condition. (7-1-93) Many states have narrative criteria for nutrients that must be interpreted to determine if beneficial uses are supported. While Idaho has not developed specific guidance to interpret their criteria, they have developed the River Macroinvertebrate Index (IDEQ, 2002) and use other parameters (DO, chlorophyll a, etc) and the narrative criteria above, to determine if nutrient problems are impairing beneficial use support.

			phosphorus. More specifically, reference conditions for Level III, Ecoregion 12 streams for total phosphorus is stated at 0.043 mg/l. The seasonal average concentration in the Lower Boise for the irrigation season currently is given to be 0.296 mg/l. This is far above the reference condition. As an indicator of nuisance aquatic growth, several sources suggest that periphyton chlorophyll a values of 100 -200 mg/m2 constitute a nuisance threshold, above which aesthetics are impaired (Horner and others, 1983; Watson and Gestring, 1996; Welch and others, 1988; Welch and others, 1989). In September 1999 IDEQ established the Boise River TMDL for sediment and bacteria. The TMDL also included discussion of nutrients, and on page 46, Figure 21 is a graph showing 33 chlorophyll a data points for five locations on the Lower Boise River. Fifteen of the measurements from Caldwell, Middleton and Glenwood Bridge are above 200 mg/m2 with a maximum measurement of >900 mg/m2. These measurements were collected from 1995 to 1997. On page 48 the document states the following:"The available data do not show major impairment of beneficial uses due to nutrients and associated nuisance aquatic growths. High nutrient concentrations and periphytic algae levels above suggested nuisance thresholds together imply that nutrients are a potential threat to aquatic life and recreational uses."On page 45, the document states the following:"It is also possible that high sediment concentrations in the river below Caldwell are preventing algae growth by limiting the amount of light that penetrates the water column. If sediment concentrations in the summer are reduced, algae growth in the reach of the river below Caldwell may increase." As mentioned above, nutrients from the Boise River also contribute to the impairment of the beneficial uses of the Snake River and Brownlee Reservoir. Sampling conducted by the Idaho Power Company indicates that significant planktonic algae occur in the Snake River just downstream from the mouth of the Boise River during the months of March through October (IDEQ, 1999). Also, the Snake River Hells Canyon phosphorus TMDL establishes a	Response: The narrative standard is interpreted as indicating that if the designated and existing beneficial uses are not impaired by the effects of excessive nutrients in the water body, nutrients are not exceeding the narrative water quality standard (IDEQ 2001). Various nuisance thresholds have been established by different studies. However, no thresholds have been proposed in relation to the adverse impacts to aquatic life. Impacts to aquatic life are generally based on DO and pH problems and the reduction of living space for aquatic organisms due to excessive algal biomass. In August 1997, the USGS took hourly DO measurements over 24 hour periods at 5 sites (Eckert, Glenwood, Middleton, Caldwell and Parma). Normal diurnal DO patterns were observed but concentrations never dropped below the criteria. No DO measurements less than 6.0 mg/L have been recorded from Lucky Peak to the mouth of the river from 1986 to 1999 (by USGS). The City of Boise submitted diurnal dissolved oxygen data to IDEQ during the listing process. Dissolved oxygen data was collected at two sites, Glenwood and Linder bridges (both below the wastewater treatment plants), in 15 minute intervals July 2004 through 2007. Dissolved oxygen (mg/L) never dropped below 6.0 mg/L. 0.08% and 1.34% of the dissolved oxygen percent saturation values were below 75% saturation at Glenwood and Linder monitoring sites, respectively. The relationship between Lower Boise River channel hydraulics, nutrients, and periphyton growth was examined in the Lower Boise River Nutrient Subbasin Assessment (IDEQ 2001). Results indicated that during the irrigation season (April to October) when conditions are most suitable for periphyton growth, velocities in the Lower Boise River are higher than the scour threshold, even in low flow years. The absence of nuisance levels of periphyton indicates that the macroinvertebrates have ample living space and that the intergravel flows are not impeded. Hydraulic conditions in the Lower Boise River mitigate for nutrient enriched conditions. In addition, DEQ complaint logs (1997-2000) indicated no complaints of nuisance growth. Irrigation companies and other water users did not report algal impediment at river withdrawal locations during the same time period. Recreational and aesthetics beneficial uses are not impaired by algae. EPA has developed Ambient Water Quality Criteria Recommendations

			target (allocation) for the Lower Boise River at 0.070 mg/l or less during the May-September timeframe. As noted above, the seasonal average concentration at the mouth of the Lower Boise for the irrigation season currently is 0.296 mg/l, far above both the Ecoregion reference condition and the TMDL target. In the Boise River TMDL (1999), DEQ evaluated macroinvertebrate data available from the USGS for five sites sampled in October of 1995 and 1996. The macroinvertebrate data indicated that the Boise River had degraded conditions from Eckert Road to its mouth. Ephemeroptera, Plecoptera, and Trichoptera (EPT) taxa richness is a traditional metric that consistently has been used to detect impacts to macroinvertebrate assemblages in rivers and streams. In the Lower Boise, a limited number of EPT taxa was found at all sites indicating that the macroinvertebrate assemblage was in poor condition. In addition, there were other metrics (i.e. Plecoptera taxa richness, % predators, etc.) that also indicated poor biological condition. Since the time of the TMDL, USGS has continued to monitor water quality and biological conditions in the Lower Boise River (MacCoy, 2004). Macroinvertebrates were collected at five sites in the Lower Boise from 1995 to 2002. The average number of EPT taxa in the Lower Boise was less than half the average number at four least-impacted, similar-sized rivers in Idaho. USGS calculated the RMI (River Macroinvertebrate Index, developed by DEQ in 2002) scores for the Lower Boise and most scores indicated poor water quality and impaired biotic integrity. In addition, USGS used a fine-sediment index to evaluate the effect of fine sediment on insect populations (Relyea et al, 2000). This index, the Fine Sediment Biotic Index (FSBI), indicated fine sediments impacted macroinvertebrates in the Lower Boise. Macroinvertebrate assemblages are monitored in rivers because they are a direct measure of the aquatic life uses. Another reason that they are used in monitoring is because macroinvertebrates integrate the effects of multiple environmental factors such as water quality, substrate quality, and habitat. In both the TMDL and in more	(EPA 822-B-0006) that present nutrient criteria for rivers and streams in Nutrient Ecoregion III (the Ecoregion which includes the Lower Boise). The recommendations are that for minimally impacted rivers and streams in Ecoregion III, the reference condition which is protective of designated uses and allows management flexibility is 0.010-0.055 mg/l total phosphate phosphorus. More specifically, reference conditions for Level III, Ecoregion 12 streams for total phosphorus are stated at 0.043 mg/l. The seasonal average concentration in the Lower Boise for the irrigation season currently is given to be 0.296 mg/l. This is far above the reference condition. Response: State Water Quality Standards include narrative criteria for nutrients. It is also unrealistic to expect reference conditions (Lochsa, St. Joe and MF Salmon Rivers) to exist in the flow and habitat conditions that exist in the Boise River. As an indicator of nuisance aquatic growth, several sources suggest that periphyton chlorophyll a values of 100 -200 mg/m2 constitute a nuisance threshold, above which aesthetics are impaired (Horner and others, 1983; Watson and Gestring, 1996; Welch and others, 1988; Welch and others, 1989). In September 1999 IDEQ established the Boise River TMDL for sediment and bacteria. The TMDL also included discussion of nutrients, and on page 46, Figure 21 is a graph showing 33 chlorophyll a data points for five locations on the Lower Boise River. Fifteen of the measurements from Caldwell, Middleton and Glenwood Bridge are above 200 mg/m2 with a maximum measurement of >900 mg/m2. These measurements were collected from 1995 to 1997. On page 48 the document states the following: "The available data do not show major impairment of beneficial uses due to nutrients and associated nuisance aquatic growths. High nutrient concentrations and periphytic algae levels above suggested nuisance thresholds together imply that nutrients are a potential threat to aquatic life and recreational uses." On page 45, the document states the following: "It is also possible that high sediment concentrations in the river below Caldwell are preventing algae growth by limiting the amount of light that penetrates the water column. If sediment concentrations in the summer are reduced, algae growth in the reach of the river below Caldwell may

			recent USGSstudies, it is clear that the macroinvertebrate assemblages in the Lower Boise River are in poor condition. The more recent USGS study shows that fine sediments impact macroinvertebrates in the Lower Boise River, however this does not mean that fine sediment is the sole stressor. The macroinvertebrates are also exposed to increased temperatures, altered flow regimes, increased phosphorus and other anthropogenic environmental factors. The cumulative and synergistic effects of these pollutants in the Lower Boise may exceed the tolerance levels of many of these taxa.In summary, EPA believes the Lower Boise is impaired for nutrients because periphyton levels are well above nuisance thresholds in the literature, phosphorus concentrations are well above EPA recommended nutrient levels and upstream background levels at Lucky Peak, and above targets set to achieve water quality standards in downstream waters (per Snake River Hells Canyon TMDL). We also believe it is very likely that excess sediment in the lower river masks additional effects of high nutrient concentrations. If the existing sediment TMDL were to be fully implemented and nutrient concentrations are not reduced, the nutrient impairment would become even worse since increased light penetration to the bottom sediments of the river would promote vegetation growth given the presence of high nutrient concentrations. Based on the data and information presented, EPA recommends that the Lower Boise remain 303(d) list for nutrients.	increase." Response: When sediment concentrations decrease in the lower river, appropriate measures will needed at that time. This question has been addressed for both phytoplankton and periphyton growth in the Lower Boise River and was included in the Lower Boise River Nutrient Subbasin Assessment (IDEQ 2001). Chen and Wells (1975) and CH2M Hill (2001) modeled phytoplankton conditions in the Lower Boise River; both concluded that if TSS in the river was reduced by 50%, algae growth would not increase more than 10%. Both studies support the conclusion that it is unlikely that sediment reductions of 37% (50 mg/L TSS target) would lead to nuisance phytoplankton growth in the lower segments of the river. Suspended chlorophyll a samples were collected in the Boise River (Diversion, Glenwood, Middleton and Parma) from 1995-2007. Only 4 of the measured values exceeded 40 ug/L and only 14 samples in a 12 year period exceeded 25 ug/L. Hydraulic conditions in the Lower Boise River mitigate for nutrient enriched conditions and limit periphyton growth (see earlier response) As mentioned above, nutrients from the Boise River also contribute to the impairment of the beneficial uses of the Snake River and Brownlee Reservoir. Sampling conducted by the Idaho Power Company indicates that significant planktonic algae occur in the Snake River just downstream from the mouth of the Boise River during the months of March through October (IDEQ, 1999). Also, the Snake River Hells Canyon phosphorus TMDL establishes a target (allocation) for the Lower Boise River at 0.070 mg/l or less during the May-September timeframe. As noted above, the seasonal average concentration at the mouth of the Lower Boise for the irrigation season currently is 0.296 mg/l, far above both the Ecoregion reference condition and the TMDL target. Response: DEQ has adopted the SRHC TMDL Implementation Plan which includes phosphorus allocations for the river to address nutrient impairment in SRHC.

				It has been acknowledged that although nutrients are not impairing beneficial uses in the Boise River, they are contributing to the impairment of beneficial uses in the Snake River and Brownlee Reservoir. The Lower Boise River received a phosphorus allocation in the Snake River-Hells Canyon TMDL. In the Boise River TMDL (1999), DEQ evaluated macroinvertebrate data available from the USGS for five sites sampled in October of 1995 and 1996. The macroinvertebrate data indicated that the Boise River had degraded conditions from Eckert Road to its mouth. Ephemeroptera, Plecoptera, and Trichoptera (EPT) taxa richness is a traditional metric that consistently has been used to detect impacts to macroinvertebrate assemblages in rivers and streams. In the Lower Boise, a limited number of EPT taxa were found at all sites indicating that the macroinvertebrate assemblage was in poor condition. In addition, there were other metrics (i.e. Plecoptera taxa richness, % predators, etc.) that also indicated poor biological condition. Since the time of the TMDL, USGS has continued to monitor water quality and biological conditions in the Lower Boise River (MacCoy, 2004). Macroinvertebrates were collected at five sites in the Lower Boise from 1995 to 2002. The average number of EPT taxa in the Lower Boise was less than half the average number at four least-impacted, similar-sized rivers in Idaho. USGS calculated the RMI (River Macroinvertebrate Index, developed by DEQ in 2002) scores for the Lower Boise and most scores indicated poor water quality and impaired biotic integrity. In addition, USGS used a fine-sediment index to evaluate the effect of fine sediment on insect populations (Relyea et al, 2000). This index, the Fine Sediment Biotic Index (FSBI), indicated fine sediments impacted macroinvertebrates in the Lower Boise. Response: The lower Boise River is a highly regulated flow and habitat altered system (three large dams above and approximately eighty diversions). There is little to no gravel recruitment and thus little suitable habitat. The lack of suitable macroinvertebrate taxa is attributed to this reality in the upper reaches and due to increased sediment loading in the lower reaches. There is no mention of nutrients contributing to the low scores in the macroinvertebrate index in the USGS report. The last sentence of the above paragraph is a correct interpretation of the USGS report. There is also an approved TMDL for sediment.

				Macroinvertebrate assemblages are monitored in rivers because they are a direct measure of the aquatic life uses. Another reason that they are used in monitoring is because macroinvertebrates integrate the effects of multiple environmental factors such as water quality, substrate quality, and habitat. In both the TMDL and in more recent USGS studies, it is clear that the macroinvertebrate assemblages in the Lower Boise River are in poor condition. The more recent USGS study shows that fine sediments impact macroinvertebrates in the Lower Boise River; however this does not mean that fine sediment is the sole stressor. The macroinvertebrates are also exposed to increased temperatures, altered flow regimes, increased phosphorus and other anthropogenic environmental factors. The cumulative and synergistic effects of these pollutants in the Lower Boise may exceed the tolerance levels of many of these taxa. Response: There is no mention of nutrients contributing to the decreased habitat for macroinvertebrates in the USGS report. There is also an approved TMDL for sediment. In summary, EPA believes the Lower Boise is impaired for nutrients because periphyton levels are well above nuisance thresholds in the literature, phosphorus concentrations are well above EPA recommended nutrient levels and upstream background levels at Lucky Peak, and above targets set to achieve WQS in downstream waters (per Snake River Hells Canyon TMDL). We also believe it is very likely that excess sediment in the lower river masks additional effects of high nutrient concentrations. If the existing sediment TMDL were to be fully implemented and nutrient concentrations are not reduced, the nutrient impairment would become even worse since increased light penetration to the bottom sediments of the river would promote vegetation growth given the presence of high nutrient concentrations. Based on the data and information presented, EPA recommends that the Lower Boise remain 303(d) list for nutrients. Response: This is speculative and not a basis for the lower Boise River to

				remain on the list for nutrients. DEQ based its proposal to delist nutrients on diel DO data collected by the USGS in August 1997. It is our opinion that this data is a better indication that nutrients are not impairing the river. General response and additional comments: The following are excerpts from the U.S. GEOLOGICAL SURVEY Scientific Investigations Report 2006-5111, Fish Communities and Related Environmental Conditions of the Lower Boise River, Southwestern Idaho, 1974-2004. Within the last century, the lower Boise River downstream of Lucky Peak Dam in southwestern Idaho has been transformed from a meandering, braided, gravel-bed river that supported large runs of salmon to a channelized, regulated, urban river that provides flood control and irrigation water… Examination of the long-term flow record from the Boise River near Boise gauging station (USGS station 13202000) just downstream of Lucky Peak Dam shows a change in the magnitude and variability of seasonal flow following dam construction. Median mean monthly discharge for December and August prior to 1915 were about 1,090 and 1,200 ft3/s, respectively, with standard deviations near 460 ft3/s. In comparison, median discharge after dam construction (post-1957) for December and August were 350 and 4,020 ft3/s, respectively, with standard deviations of 350 and 640 ft3/s, respectively (U.S. Geological Survey National Water Information System Web site, accessed August 30, 2005, at http://nwis.waterdata.usgs.gov/id/nwis/qwdata). In fact, the flow regime in 2002 is opposite of pre-dam flows in December and August. The mean December post-dam flows are significantly lower than those in pre-dam years (P<0.001, Wilcoxon rank sum test with a=0.05); and the mean August post-dam flows are significantly higher (P<0.001, Wilcoxon rank sum test with a=0.05) than those recorded during pre-dam years. Little information is available on the effect of flow alteration on the lower Boise River fishery, although most of the lower Boise River fish investigations have indicated that low winter flows were the reason for the decrease in the fish community (Idaho Department of Fish and Game,

				1975; 1988; 2000; Mullins, 1999a). Altering the flow regime affects not only the fish community, but the entire aquatic environment. Several studies have shown that altering the natural river flow regime affects fish community biodiversity, food availability, habitat complexity, life history patterns, and connectivity (the ability of an organism to move freely through the stream hierarchy) (Ward and Stanford, 1983; Collier and others, 1996; Poff and others, 1997; Bunn and Arthington, 2002; Postel and Richter, 2003). The lack of higher flows to recruit and move gravel for riffle habitat and to mobilize fine sediment has caused embeddedness throughout the river that measures between 50 and 75 percent. IBI scores for all sites were negatively correlated with maximum instantaneous water temperature, specific conductance, and suspended sediment; as well as the basin land-use metrics of area of developed land, impervious surface area, and number of major diversions within a subbasin. It is this body of evidence that leads DEQ to believe that the lower Boise River is not impaired by nutrients.
366.	ID17050114SW008_03	22	*DEQ is proposing to de-list Tenmile Creek for sediment because water quality standards are being met. The rationale provided states:While a population of transient adult rainbow trout likely resides in Fivemile and Tenmile Creek, further protection from water column sediment is not necessary. The existing TSS concentrations at the monitoring sites above the mouths of both streams rarely exceed 50mg/L, which is a threshold for juvenile fish, and hence overly stringent for adult fish.EPA has reviewed the monitoring results for this assessment unit found on Idaho's Integrated Report website which includes results from two BURP monitoring sites. The Idaho WBAG II (IDEQ, 2002) indicates that average BURP scores of < 2 means that a waterbody is not full supporting beneficial uses. The results above indicate this waterbody is not supporting coldwater beneficial uses. This rationale*	DEQ prepared and submitted a Use Attainability Analysis (UAA) in 2002 to establish a modified use for this segment. Tenmile Creek was designated in the Idaho WQS for cold water biota and secondary contact recreation. Recognizing that cold water biota and secondary contact recreation may not be appropriate beneficial uses for highly regulated and irrigation driven systems, the lower Boise Watershed Advisory Group commissioned a consultant to perform a beneficial use evaluation for Tenmile Creek to characterize the appropriate beneficial uses and submitted it to DEQ. The analysis showed that a modified aquatic life use accurately defines the best attainable conditions in the stream. The modified aquatic life use describes streams that are limited in aquatic life diversity due to factors such as ephemeral or intermittent flow, naturally occurring pollutant levels or long-standing hydrologic modification. EPA subsequently disapproved the UAA for modified use and approved the secondary contact recreation change. The comments you reference

			appears inconsistent with WBAG guidance regarding minimum threshold for macroinvertebrate scoring. On page 6-13, WBAG II indicates that "If there are any scores below minimum threshold levels, then DEQ automatically determines the waterbody is not fully supporting". SMI scores for this waterbody appear to be below the minimum threshold.The use of TSS data alone to evaluate beneficial use support, or to override beneficial use status calls based on BURP data and WBAG II procedures, is not supportable. TSS is only one component of the sediment load, and may not reflect substrate sediment levels or the level of impairment of aquatic life impacted by substrate sediment. The rationale provided above suggests that if average TSS levels are < 50 mg/l, adult rainbow trout will be protected. The IDEQ suggested threshold of 50 mg/l is not necessarily protective of all forms or lifestages of coldwater biota. EPA has accepted a 50 mg/l as a TMDL target in some circumstances, primarily because it has resulted in substantial % reduction goals in sediment loading. This should not be construed to suggest that we believe this level fully protects beneficial uses, or should be used to evaluate beneficial use support. Furthermore, the Lower Boise subbasin assessment indicates that this level was exceeded in Tenmile Creek, based on average values for the irrigation season of 62 mg/l (p. 31).Based on this information, Tenmile Creek should remain listed in Category 5 for sediment.	presume that the UAA was approved and that Tenmile Creek supports uses reflected in the modified category. With this in mind, a sediment TMDL will be prepared based on available resources and given a priority for completion.
367.	ID17050120SW001_05	22	*DEQ is proposing to de-list South Fork Payette River for sediment because water quality standards are being met. After reviewing the documentation in the South Fork Payette TMDL it appears that bedload sediment is the main problem in the mainstem, so suspended sediment concentrations (SSC) meeting targets is not a compelling argument to de-list this water. Even so, the Subbasin Assessment states that SSC are above targets at high flows, which shows there is impairment, even if using suspended sediment concentrations were appropriate. The Subbasin Assessment attributes sediment problems to roads and natural causes, so it acknowledges*	Agree. The South Fork Payette River will remain in Section 5 for sediment until it comes up for 5 year review.

			anthropogenic causes for impairment. This in itself is reason enough not to de-list. DEQ references only one BURP site on a long stretch of this river which doesn't sufficiently characterize the impacts from areas near roads. Also, Redband trout fish density have decreased from 1996-2003. Though mountain whitefish densities have increased, they are still lower than levels from 1988-1990. Based on this information, South Fork Payette River should remain listed in Category 5 for sediment.	
368.	ID17050122SW003_06	22	*The de-listing justification for sediment suggests that a TMDL was developed for this section of the River. The rationale provides no documentation to suggest that sediment is not continuing to impair beneficial uses in this segment. Consequently placement of these segments in either Category 3 or 1 of the IR does not appear to be supported at this time.*	The TMDL referred to in the delisting rationale was developed for the upper section of the NF Payette River, far upstream of this assessment unit. The salient points in the rationale for delisting are quoted directly from page 81 of the TMDL, approved in August 2005: The North Fork Payette River drainage meets suspended sediment targets and thus does not load excess suspended sediment to Black Canyon Reservoir. Even when mass wasting events occur, concentrations over a 30-day period likely meet the 50mg/L suspended sediment concentration target.
369.	ID17050122SW012_02	22	*Soldier Creek is discussed in the North Fork Payette River Subbasin Assessment and TMDL and is proposed for de-listing because of intermittent flow.*	DEQ proposed delisting upper Soldier Creek in the North Fork Payette TMDL document, approved by EPA in August 2005. However, the rationale was because the creek was meeting sediment targets, not because it was intermittent. From page 131 of that document: "Soldier Creek is listed on the 1998 303(d) list for sediment. DEQ proposes de-listing Soldier Creek from the headwaters to the confluence with North Fork Soldier Creek (17050122SW012_02). Soldier Creek flows through rangeland and is subject to sediment inputs from both roads and grazing activities. Channel erosion surveys were conducted in 2004 because in-stream channel erosion was surmised to be the biggest contributor of sediment. In the middle and upper reaches of Soldier Creek, the banks were >85% stable and sediment does not impair beneficial uses."
370.	ID17050122SW015_02	22	*Bissel Creek is discussed in the Bissel Creek Subbasin Assessment and TMDLand is being proposed for de-listing because of intermittent flow.*	Based on EPA's comments regarding delisting of intermittent streams, DEQ will return this assessment unit to its prior place on the 303(d) list, pending sampling of water quality during the late spring.
371.	ID17060201SL010_02	22	*In 1992 EPA approved a sediment TMDL for the South*	Our information shows the 1st and 2nd order tributaries of the SF Salmon

			Fork Salmon River, specifically the three uppermost segments of the upper South Fork Salmon (PNRS # 918, 919, 920). The East Fork South Fork Salmon River was specifically excluded. Because the identified segments were large in scale and discussion in the TMDL frequently referenced restoration activities in tributaries, it appears that the intent of the TMDL was to cover both the mainstem SF Salmon and tributaries, except the EFSF Salmon River. For that reason, we recommend that both Johnson Creek and SF Salmon 1st and 2nd order tributary segments be moved to Category 4a, since the approved TMDL appears to include these waters.	River (ID17060208SL010_02) to be fully supporting beneficial uses. The 3rd and 4th order tributaries are listed. Goat Creek, the 3rd order is fully supporting uses and should be moved to Section 2. SF Salmon River, the 3rd and 4th order have a completed TMDL and should be moved to Section 4a. See South Fork Salmon River Map (last page) showing AUs vs. PNRS#.
372.	ID17060208SL023_05	22	*In 1992 EPA approved a sediment TMDL for the South Fork Salmon River, specifically the three uppermost segments of the upper South Fork Salmon (PNRS # 918, 919, 920). The East Fork South Fork Salmon River was specifically excluded. Because the identified segments were large in scale and discussion in the TMDL frequently referenced restoration activities in tributaries, it appears that the intent of the TMDL was to cover both the mainstem SF Salmon and tributaries, except the EFSF Salmon River. For that reason, we recommend that both Johnson Creek and SF Salmon 1st and 2nd order tributary segments be moved to Category 4a, since the approved TMDL appears to include these waters. The rationale for de-listing the above waterbodies provides no information to suggest that sediment is not continuing to impair beneficial uses in these segments. In fact, it points to evidence that the existing road system continues to contribute large quantities of sediment during storm events. Consequently placement of these segments in either Category 3 or 1 of the IR does not appear to be supported at this time.The rationale for de-listing East Fork South Fork Salmon River for sediment is the same as for Johnson Creek and the South Fork Salmon River, and provides no information to suggest that sediment is not continuing to impair beneficial uses in this segment. In fact, it points to evidence that the existing road system continues to contribute large quantities of sediment during storm events. As mentioned above, the 1992 SF Salmon*	Agreed. EPA approved TMDL covers PNRS# 918, 919, & 920. EFSF Salmon River will remain in Section 5 of the 2008 IR. See South Fork Salmon River Map (last page) showing AUs vs. PNRS#.

			River TMDL specifically excludes this waterbody. Consequently the East Fork South Fork Salmon River should remain in Category 5 of the 2008 list for sediment.	
373.	ID17060208SL025_04	22	*In 1992 EPA approved a sediment TMDL for the South Fork Salmon River, specifically the three uppermost segments of the upper South Fork Salmon (PNRS # 918, 919, 920). The East Fork South Fork Salmon River was specifically excluded. Because the identified segments were large in scale and discussion in the TMDL frequently referenced restoration activities in tributaries, it appears that the intent of the TMDL was to cover both the mainstem SF Salmon and tributaries, except the EFSF Salmon River. For that reason, we recommend that both Johnson Creek and SF Salmon 1st and 2nd order tributary segments be moved to Category 4a, since the approved TMDL appears to include these waters. The rationale for de-listing the above waterbodies provides no information to suggest that sediment is not continuing to impair beneficial uses in these segments. In fact, it points to evidence that the existing road system continues to contribute large quantities of sediment during storm events. Consequently placement of these segments in either Category 3 or 1 of the IR does not appear to be supported at this time.The rationale for de-listing East Fork South Fork Salmon River for sediment is the same as for Johnson Creek and the South Fork Salmon River, and provides no information to suggest that sediment is not continuing to impair beneficial uses in this segment. In fact, it points to evidence that the existing road system continues to contribute large quantities of sediment during storm events. As mentioned above, the 1992 SF Salmon River TMDL specifically excludes this waterbody. Consequently the East Fork South Fork Salmon River should remain in Category 5 of the 2008 list for sediment.*	Agreed. EPA approved TMDL covers PNRS# 918, 919, & 920. See South Fork Salmon River Map (last page) showing AUs vs. PNRS#.
374.	ID17060210SL001_02	22	*The information provided in the pages cited in the de-listing justification for the TMDL do not offer conclusive information that these waters are not impaired. The pages cited do not include any BURP data to suggest that beneficial uses are not impaired. In fact, all of the waters (Sheep, Hat, Denny, Lookwood and Rattlesnake) all note*	ID17060210SL001_02. No BURP information exists. Data exists to indicate spawning and rearing of salmonid species in this AU. However, since the data is not current, DEQ will put this assessment unit back in category 5 for sediment and conduct BURP inventory (s) of representative stream(s) in this AU to determine beneficial use support.

			that the drainages have been impacted by logging, roads, livestock grazing and in some of the creeks, recreation. These are all activities that can have significant sediment impact on streams.If BURP data exists, please provide it to support this de-listing. Based on the information provided, DEQ has not provided the documentation necessary to support this de-listing.	
375.	ID17060307CL007_02b	22	*DEQ is proposing to de-list Hem Creek for temperature because water quality standards are being met. DEQ notes temperature exceedances in Hem Creek but concludes that Hem Creek is in a natural condition. EPA has reviewed DEQ's de-listing justification and other documentation on Hem Creek. After reviewing aerial photographs from 1998 and 2004, it is clear that harvest management has been going on in this watershed during the past several years. Our review has found that there is evidence of anthropogenic activities that could influence temperature (air photos of timber harvest, roads), which would need to be analyzed in more detail (consistent with DEQ's 2003 natural conditions guidance) to establish conclusively whether or not these activities have influenced stream temperature. The de-listing justification also discusses the CWE model. As you are aware, EPA provided substantial comments on the use of CWE in 2001 (Psyk, 2001). EPA accepted CWE as a tool to help establish shade targets in TMDLs, but we never accepted its use for demonstrating natural conditions. Furthermore, no information is presented to indicate that DEQ has evaluated watershed conditions in a manner recommended in their natural conditions guidance. Since 2001, DEQ has discarded the use of CWE for TMDL purposes, so it seems inappropriate that it would be used in this situation.Based on this information, Hem Creek should remain listed in Category 5 for temperature.*	1997 and 1998 Beneficial Use Reconnaissance data applied in the Waterbody Assessment Guidance (WBAGII, Grafe, 2002), show the highest condition rating scores for the stream macroinvetebrate index, stream fish index, and stream habitat index (3.0). The condition category is above the 25th percentile of reference condition for this assessment unit. Additionally, macroinvertebrate samples were comprised of 22.7% obligate cold water bugs, and the Stream Fish Index contained 100% cold water fish (salmonids). Samples also included >150 Tailed Frog tadpoles, and Pacific Giant Salamanders. The Clearwater National Forest staff recommended Hem Creek as a reference stream for DEQ's Beneficial Use Reconnaissance Program monitoring. Observation of human activities does not equate to a WQS violation. Hem Creek is within the Clearwater National Forest and required to be managed by the Federal Inland Native Fish Strategy (INFISH) (USFS, 1995). INFISH is implemented to address excess heat loading regardless of original cause. INFISH could be considered equivalent to or meeting potential natural vegetation desired canopy cover. DEQ is not citing CWE as a de-listing rationale. DEQ is stating that mandatory INFISH 300' setbacks are observed on the entirety of Hem Creek and those no entry setbacks achieve a far higher canopy closure than any PNV based TMDL could. Further DEQ is not stating that INFISH is a defacto WQS rather that this AU was evaluated ***in the TMDL process and due to its extraordinarily high biological scores coupled with the 300' setbacks no action was deemed needed.*** DEQ maintains Hem Creek is fully supporting its beneficial uses and will be appropriately found in Section 2.

376.	ID17010104PN008_02	23	*Working with the KM WAG we determined that Long Canyon Creek is a reference watershed. this water fully supports it's beneficial uses but fails numeric critieria.*	DEQ agrees that the temperature listing may not reflect natural stream temperatures and the land use activities in the watershed; however, using the current assessment methodology DEQ is required to list the assessment unit for temperature violations when temperature data is available. Continuous temperature data loggers deployed near the mouth of the stream, in the forested portion of the watershed, show violations of Idaho's numeric water quality criteria. Violations of this criteria warrant the assessment unit/temperature listing. Exceedances of water quality criteria will be reviewed during the five-year review period of the Kootenai/Moyie Subbasin Assessment and TMDL. During the five-year review the temperature listing will be evaluated against the natural conditions provision in the Idaho WQS. Evaluation against the natural condition provision will take into consideration land use activities in the watershed.
377.	ID17010105PN006_02	23	*Assessment Unit ID17010105PN006_02. should have it's name changed. This assessment unit's name in 2002 was "Moyie River – Idaho/Canadian border to Round Prairie Creek". The name should be changed to something like: "Tributaries that flow into Moyie River in section between Canadian border and Round Prairie Creek, including: Spruce Cr., Copper Cr., Brass Cr., and Line Cr."*	Comment will be incorporated.
378.	ID17010213PN010_04	23	*I want to remind DEQ that many of the streams in the Clark Fork have approved TMDLs and need to be moved to 4a. I am also testing the comment entry feature*	Comment will be incorporated.
379.	ID17010104PN004_02	24	*As a member of the KVRI Lower Kootenai/Moyie WAG Technical Committee, I am confused and disappointed at the change by DEQ in the designation of Blue Joe Creek from Category 4b to 5. In the Sumer of 2003, EPA conducted and extensive clean up of Blue Joe Creek with, I assume, appropriate oversight. If this cleanup was considered to be appropriate and successful, why is the WAG Technical Committee expected of develop a TMDL for Blue Joe Creek? Requests from EPA for additional data and monitoring indicate a lack of communication within the EPA or admission that the action was not sufficient to recover Blue Joe Creek. Is continued monitoring by EPA or U.S. Forest Service (over which much of the recovery area is located) not a part of that*	DEQ's effort to document a Section 4(b) justification for the metals impairing Blue Joe Creek fell short as additional documentation from the CERCLA removal action on Blue Joe Creek was disclosed by EPA. Here is an excerpt from the 2004 Removal Action report: "…surface water and groundwater treatment was not addressed as part of the Removal Action. It is anticipated that beneficial effects from the completed work will result in minimizing the availability of source metals contamination. The IDEQ will address water quality issues as part of its TMDL program by establishing metals load limits for Blue Joe Creek in 2005. The TMDL will require, by law, a TMDL implementation plan that may require additional projects aimed at reducing metals loading. [....] Compliance with the TMDL plan will be the responsibility of CLI, the property owner (EPA 2003)."

			recovery project? If any stream segment is suited for a 4b designation, Blue Joe Creek should qualify. Please reconsider the designation back to 4b. Thank you.	-Removal Action Report Continental Mine. USEPA. January, 2004. Based on the above disclosure it is clear that Blue Joe needs to be in Section 5 and a TMDL does need to be developed unless the USFS or the land owner can provide Tier 1 data indicating that Blue Joe Creek meets Idaho WQS and supports it's beneficial uses whereby a de-listing to Section 2 of the IR can be proposed. Alternatively, if interested parties can demonstrate a clear downward trend in metals concentrations and that remedial actions on Blue Joe Creek will result in WQS being attained and the beneficial uses being supported in a reasonable timeframe then a 4(b) justification could be proposed for the 2010 IR.
380.		25	*The Department of Environmental Quality (DEQ) and the United States Geological Survey (USGS) has recently conducted numerous field studies to assess mercury in waters across Idaho. The focus of this work has been the collection fish and analysis of fish tissue to assess mercury contamination.* *In reviewing the draft report we note that the report does not integrate the fish tissue data that have been collected and analyzed over the course of the last year (2007). Indeed, only three waters are listed for mercury (Jordon Creek, Brownlee, American Falls). We also noted that Salmon Falls Reservoir was not mentioned for mercury even though DEQ has crafted a mercury TMDL for this water.* *We would ask that DEQ please consult with Don Essig at the DEQ water program and Terry Maret at USGS integrate their data into this report. I am enclosing a copy of a DEQ fact sheet on mercury in fish – which was crafted with Mr. Essig's data. The map on the back clearly demonstrates that there are numerous waters in Idaho that exceed Idaho's water quality standard for mercury. I am also including a copy of the fish tissue data that Mr. Maret has released; his*	All data mentioned have been reviewed and Section 5 listings have been made where the data supported Mercury and/or Selenium Data warranted per 2008 Integrated Report Policies and Procedures Document.

			work has focused on different waters than Mr. Essig. *In addition to these relatively new data sets, I believe that DEQ has several other data sets that demonstrate mercury non-compliance. These older data sets have been used to justify the fish consumption advisories at several waters (CJ Strike, Lake Lowell, Priest Lake, Salmon Falls, Lake Coeur d'Alene, Lake Pend Oreille). We recognize that the Me-Hg fish tissue level that mandates a fish advisory is slightly lower than the Me-Hg tissue criteria used for the water quality criteria. However, we are aware that many of the datasets used to justify the fish advisories indeed demonstrate exceedance of the Idaho mercury standard of 0.3 mg Me-Hg/kg of fish tissue. Page 28 of the draft report states, "Since Idaho is relying on the Me-Hg criterion to protect aquatic life, for 303(d) listing purposes if human health use is impaired aquatic life use will be assumed to be impaired as well." Thus, these waters should be listed in section 5 of the 303d list.* *We believe that this data has been vetted extensively within DEQ and other state and federal agencies. The conclusions of this work have been made generally available to the public via the DEQ website, DEQ presentations and numerous media accounts. As such, it seems appropriate that those waters that are impaired by mercury but that were not included in the draft 303(d) list, can be included without the need to re-circulate the 303(d) list as draft for public comment.* *DEQ has done an excellent job of collecting and analyzing this important data and it needs to be used to inform Idaho's 303(d) list. Failure to include these waters in the pending 2008 303(d) list will result in a substantial delay actions (like the development of TMDLs) which are needed to protect human health.*	
381.		25	*Waters that should in section 5 not section 4C:*	DEQ disagrees that waters impaired by pollution must be listed in

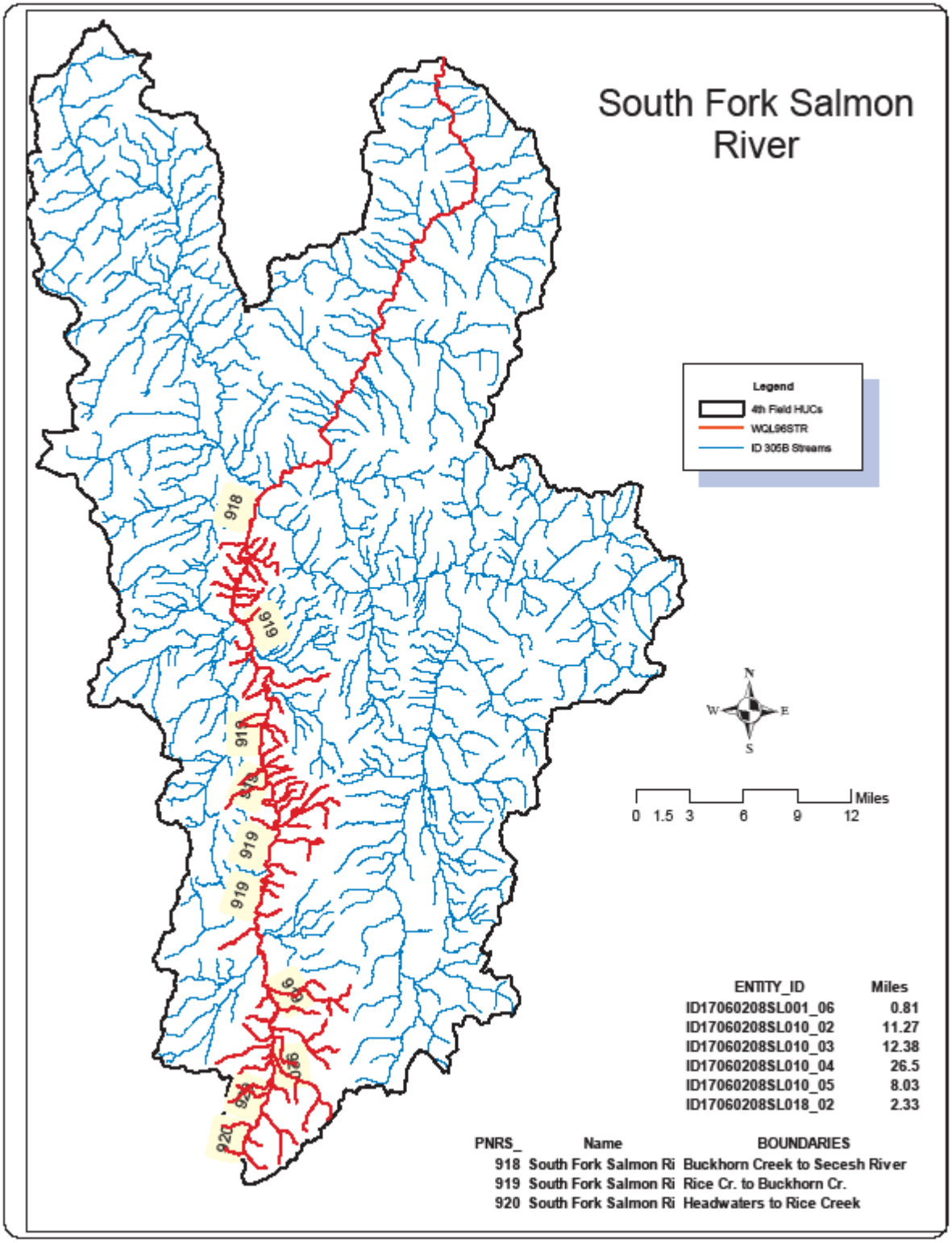
			The exclusion of waters from section 5 (the 303(d) list) of the draft report based on the argument that the impairment is not caused by a "pollutant" is inconsistent with the Clean Water Act. *According to the Clean Water Act, states must identify waters for which "best practicable control technologies" (Section 1311(b)(1)(A)) and secondary treatment at sewage treatment plants (1311(b)(1)(B)) are, by themselves, not adequate "to implement any water quality standard applicable to such waters." 33 U.S.C. § 1313(d)(1)(A). (Emphasis added)* *As a matter of law then, waters listed in section 4C as impaired by "pollution" must be moved to section 5 (the 303(d) list) if any applicable water quality standard (including a use, a criterion, and/or the anti-degradation policy) is not, or is not expected to be, met. This would include waters listed in the draft report as impaired by flow or habitat alteration if any standard is affected. So, if the aquatic life use is impaired due to habitat alterations, that water must be listed in section 5 (the 303(d) list) under the statute.* *Although the relevant regulations may muddy the waters (by discussing "pollution" at some points and "pollutants" at others), regulatory provisions cannot lawfully be used to amend the statutory criteria governing the listing process, or to decline to identify for TMDL establishment water that the statute indicates must be identified. See, e.g., Social Security Admin. v. FLRA, 201 F.3d 465, 471 (D.C. Cir. 2000) ("A regulation which … operates to create a rule out of harmony with the statute, is a mere nullity.").* *Even if the above was not established in law, the regulations do not separate "pollutants" from "pollution" for listing purposes. The listing portion of the regulations reads, in part:*	Section 5. Section 303d requires TMDLs be calculated for "pollutants". Flow alteration for example, is not a pollutant as defined by the CWA. See §502(6) and EPA Guidance for 2006 Assessment, Listing and Reporting requirements pursuant to §303(d), 305(b) and 314 of CWA (July 29, 2005). The sole purpose of Section 5 is to identify and prioritize Assessment Units for TMDL development. Section 5 is reserved for impaired Assessment Units that are due a Total Maximum Daily Load (TMDL). Circumstances exist that can impair an Assessment Unit but for which DEQ cannot write a TMDL. These circumstances include: 1) An EPA established TMDL; 2) a Section 4(b) justification; or 3) impairment due to a non-pollutant (flow or habitat alteration). AUs that fall into one of those 3 situations are placed in Section 4 of the IR. Section 4 is defined as AUs with impaired beneficial use(s) and/or which fail to meet WQS. Two points should be emphasized here, first AU-pollutant combinations are independent of one another and therefore an AU can appear in both Section 4 and Section 5. Second is that when an AU is found in Section 4 it means that the AU is still impaired. It is not until the TMDL or other remedial plan is implemented that DEQ will re-monitor and assess whether the AU continues to be impaired. When DEQ can demonstrate that the AU supports beneficial uses and meets WQS the AU will be moved into Section 2. Impairment by flow and/or habitat alteration is not suitable for TMDL development. Almost all AUs in Section 4c are impaired by other causes such as sediment.. TMDLs are then developed for those pollutants best suited for TMDL development. Implementing those TMDLs can often work to address flow and habitat alteration impairments.

			(1) Each State shall identify those water quality-limited segments still requiring TMDLs within its boundaries for which: *(i) Technology-based effluent limitations required by sections 301(b), 306, 307, or other sections of the Act;* *(ii) More stringent effluent limitations (including prohibitions) required by either State or local authority preserved by section 510 of the Act, or Federal authority (law, regulation, or treaty); and* *(iii) Other pollution control requirements (e.g., best management practices) required by local, State, or Federal authority are not stringent enough to implement any water quality standards (WQS) applicable to such waters.* *(3) For the purposes of listing waters under § 130.7(b), the term "water quality standard applicable to such waters" and "applicable water quality standards" refer to those water quality standards established under section 303 of the Act, including numeric criteria, narrative criteria, waterbody uses, and antidegradation requirements.* *40 CFR § 130.7(b)* *The language here does not contemplate any separation between "pollutant" and "pollution." Instead, the regulation reiterates that the list is to include consideration of any applicable water quality standard.*	
382.		25	*Unassessed wilderness/roadless waters should be in section 3, not section 1:* *The assumption that all waters in wilderness and select roadless areas met all water quality standards is not based in fact.* *According to the draft report, all wilderness waters and a subset of roadless area waters are assumed to be*	DEQ concurs with the concept and carefully screened each AU proposed for Section 1 as outlined in DEQ's Principles and Policies for the Integrated Report. Many AUs in and around the Frank Church River of No Return Wilderness were rejected due to similar concerns. On page 26 of Principles and Policies for the 2008 DRAFT INTEGRATED (303(d)/305(b)) REPORT (Principles and Policies Document hereafter) states: "Natural background condition does not necessarily equal pristine…." Of all the waters in Idaho, these waters stand out, and some waters that have monitored have been selected as part of the reference

			meeting all uses and so are placed into section 1. This assumption is not based on any kind of factual data. Indeed, on page 26 of the draft report, DEQ notes that "the policy [of placing wilderness and roadless waters in section 1] only applies to waters that DEQ has not yet assessed (thus, no data waters) or has assessed as fully supporting and within the roadless/wilderness definition above. *While it is true that many of these waters should be Idaho's finest, many uses are allowed in wilderness and roadless areas that can harm water quality. Ongoing grazing and historic mining are obvious examples of possible impairment in Idaho. The agency must not place these waters into section 1 without information to back up the claim. Where no data exists, these waters should be placed in section 3 and scheduled for monitoring.*	trend network. The number of assessment units (AUs) qualified for the wilderness policy are 359 out of 5,360 statewide, or 6.7% percent of the state's waters. These numbers are based on review of updated wilderness and roadless coverages made available since the 2002 Integrated Report. This policy is not applied to previously listed waters; thus there are no de-listings associated with this policy, and the policy only applies to waters that DEQ has not yet assessed (thus, no data waters) or has assessed as fully supporting and within the roadless/wilderness definition.
383.	ID17050111SW001_02	25	*The draft report lists this AU as fully supporting all uses. This is not accurate. Indeed, at least some sections of Montezuma Creek should be listed in section 5 of the 303(d) list as impaired due to arsenic contamination. E-mail additonal comment from ICL: Folks in Atlanta use Montezuma Creek water for irrigation. So these water right holders are diverting from downstream of the Talache Adit and applying to food crops and yards. I think that night affect what WQS is deemed relevant.* *Historically, there has been a significant amount of hard rock mining activity in the vicinity of the Town of Atlanta. Both mills and mines have operated immediately adjacent to Montezuma Creek. The Talache mine adit currently drains into Montezuma Creek. The Talache adit is owed and operated by the Atlanta Gold Corporation.* *The arsenic and iron rich discharge from the Talache adit came to our attention several years ago. It seems that Atlanta Gold Corporation had been discharging this wastewater to Montezuma Creek without a NPDES permit*	DEQ agrees that these data show that Montezuma Creek is in violation of State arsenic criteria. As a result, this entire assessment unit has been listed because of arsenic contamination in Montezuma Creek. The following beneficial uses are not fully supported: Primary contact recreation, Cold Water Aquatic Life, Salmonid Spawning and Domestic Water Supply. However, this is a very large assessment unit, comprising all the small first and second order tributaries to the MF Boise River. Most of the other streams are not affected by mine pollution in the same way as Montezuma Creek. For that reason, we will split the assessment unit into two parts: 1) Montezuma Creek and Quartz Gulch. This will remain 303(d) listed for the above pollutant/use combinations. 2) The rest of the 1st and 2nd order tributaries to the MF Boise River. Multiple BURP scores indicate this is not impaired, and it will revert to 'fully supporting' Aquatic Life, Salmonid Spawning, Drinking Water Supply and Cold Water Aquatic Life.

			for many years. *The Idaho Conservation League filed a Clean Water Act related lawsuit against Atlanta Gold for the discharges. This case was subsequently settled. Pursuant to the settlement, Atlanta Gold has applied to EPA for an NPDES permit and has installed a treatment facility to remove some amount of the arsenic from its discharge. To date, Atlanta Gold has not yet received an NPDES permit for this discharge. The discharge from the Talache adit's wastewater treatment facility has very elevated levels of arsenic and iron.* *Water samples from 2004 in Montezuma Creek demonstrated extremely elevated arsenic levels, often exceeding 1000 ug/l.* *The completion and operation of the Talache adit water treatment facility has resulted in the potential for reduced concentrations of arsenic (and iron) in the facility's discharge.* *Atlanta Gold Corporation has conducted fairly regular sampling in the area impacted by their discharge. Sample locations include: water discharging from the Talache adit and into the treatment facility (900 adit), Montezuma Creek water upstream from their treatment facility (AG-26), waste water at the point of discharge to Montezuma Creek (Doug Pond Overflow and then later East Pond Overflow, and water in Montezuma Creek at various downstream points.* *This dataset clearly demonstrates that this stretch of Montezuma Creek (i.e. immediately downstream of the Talache adit) periodically exceeds State water quality standards – CMC, CCC and Water and Organisms – for arsenic.*	Ideally, DEQ would split the assessment unit and make the above changes before the final integrated report was submitted. This may be possible, but the changes may have to be made after the submission date.
384.	ID17050114SW001_06	25	*DEQ has proposed to "delist" the segment of the Lower Boise River from Indian Creek to the mouth at the Snake River (ID17050114SW001_06) for nutrients (total*	This is a response to the Idaho Conservation League's assertion that the lower Boise River should remain on the §303 (d) list for nutrients.

			phosphorus). We believe this action is not supported by the best available data and that this AU should remain listed. *DEQ appears to be relying on the 2001 document "Lower Boise River Nutrient Sub-Basin Assessment" to rationalize this de-listing. Our review of this Assessment, coupled with additional data in more recent studies and DEQ work, leads us to the conclusion that this AU of the Boise River is indeed impaired by Nutrients.* *In 2002 the DEQ developed the River Macroinvertebrate Index (RMI) as one means of gauging the health and integrity of waters. Recent work by the USGS (see Water-Quality and Biological Conditions in the Lower Boise River, Ada and Canyon Counties, Idaho, 1994-2002, published in 2004 by MacCoy) calculated the RMI scores for the Lower Boise. MacCoy's work revealed that phosphorous concentrations increased more than seven times over the years studied and noted that metrics of water quality declined as one ventured further downstream. Consistent with this, chlorophyll-a concentrations, used as an indicator of nutrient input and the potential for nuisance algal growth, increased in a downstream direction. In addition, it was noted that Idaho River Fish Index scores also decreased as one proceeded downstream, with the lowest scores observed near the mouth of the river. These results indicate that the Lower Boise River has poor water quality and poor aquatic biota health.* *Quantitative water quality data for the Lower Boise also demonstrates lower water quality as a result of excess nutrient loads. The Ambient Water Quality Recommendations crafted by EPA to be specific to the ecoregion that includes the Lower Boise River utilize a reference condition for total phosphorous of 0.043 mg/l. The Lower Boise River's average total phosphorous concentration of 0.296 mg/l during the irrigation season is significantly higher than EPA's reference condition.*	Low RMI scores: The lower Boise River is a highly regulated flow and habitat altered system (three large dams above and approximately eighty diversions). There is little to no gravel recruitment and thus little suitable habitat. The lack of suitable macroinvertebrate taxa is attributed to this reality in the upper reaches and due to increased sediment loading in the lower reaches. There is no mention of nutrients contributing to the low scores in the macroinvertebrate index in the USGS report. There is also an approved TMDL for sediment. High TP concentrations: DEQ has drafted a TMDL which includes phosphorus allocations for the river to address nutrient impairment in SRHC. Phosphorus is not a toxic pollutant and high concentrations do not necessarily equate to impairment of beneficial uses. We also note that DEQ's nutrient criteria are narrative and not bound by Level III Ecoregion criteria recommendations for nutrients. River Fish Index: The following are excerpts from the U.S. GEOLOGICAL SURVEY Scientific Investigations Report 2006-5111, Fish Communities and Related Environmental Conditions of the Lower Boise River, Southwestern Idaho, 1974 - 2004 The Index of Biotic Integrity (IBI) scores for all sites were negatively correlated with maximum instantaneous water temperature, specific conductance, and suspended sediment; as well as the basin land-use metrics of area of developed land, impervious surface area, and number of major diversions within a subbasin. Within the last century, the lower Boise River downstream of Lucky Peak Dam in southwestern Idaho has been transformed from a meandering, braided, gravel-bed river that supported large runs of salmon to a channelized, regulated, urban river that provides flood control and irrigation water. The lack of higher flows to recruit and move gravel for riffle habitat and to mobilize fine sediment has caused embeddedness throughout the river that measures between 50 and 75 percent. With the above excerpts in mind, it appears that increased sediment, flow and habitat modification contributes to the change in fish populations.

			Elevated levels of phosphorous in the Boise River not only impair water quality and aquatic health in the Boise River. Phosphorous from the Boise contributes to water quality problems in Brownlee Reservoir. Indeed, the Brownlee nutrient TMDL calls for phosphorus reductions in the Boise River and other tributaries. *There is solid data that demonstrates that the Lower Boise River is impaired as a result of elevated levels of total phosphorous. As a result, the Lower Boise should not be delisted for nutrients.*	Reference Conditions: State WQS include narrative criteria for nutrients. It is also unrealistic to expect reference conditions (Lochsa, St. Joe and MF Salmon Rivers) to exist in the flow and habitat conditions that exist in the Boise River. The reference conditions for nutrients have no force of law. Impacts to Brownlee Reservoir: The contribution to impairment in downstream reaches is not a basis for listing the Boise River. There is an approved TMDL for Brownlee Reservoir. It is this body of evidence that leads DEQ to believe that the lower Boise River is not impaired by nutrients.
385.	Wooley Valley Creek, Sheep Creek below the West Fork of Sheep, West Fork of Sheep Creek	25	*We note that many waters in the vicinity of the phosphate mines in SE Idaho are listed for selenium. It appears that several waters that should be included on the 303(d) list are not on the list.* *DEQ staffer person Greg Mladenka recently presented pertinent information at DEQ's annual non-point conference, reporting on selenium concentrations in numerous waters in the phosphate area. His data included information showing levels of selenium in Wooley Creek and Sheep Creek that exceed water quality standards. Please see the attached copy of Mr. Mladenka's presentation for specific data.* *With regard to the West Fork of Sheep Creek, the EPA has recently notified Monsanto/P4 that their ongoing and unpermitted discharges from one of their rock dumps is causing exceedances of water quality standards for selenium in this creek. The attached letter from EPA to P4 chronicles this exceedance and provides specific data.* *Pursuant to this data, these three waters should be placed on the 303(d) list.*	Sheep Creek and West Fork Sheep Creek have been added to section 5 (impaired rivers) because water samples collected in 2008 (IDEQ Area-Wide Annual sampling) from Sheep Creek exceeded the 4-day average selenium concentration criteria of 0.005 mg/l total recoverable selenium. Sheep Cr. also exceeded this criterion in May 2006 but not in May 2007. IDAPA 58.01.02.210.03.c.v. states criteria concentrations are not to be exceeded more than once in three years. These recent data suggest a criteria exceedance of twice in three years creating a WQS violation which meets the requirements for impaired status and listing. Wooley Valley Creek did not exceed criteria in 2008 (IDEQ Area Wide Annual sampling) and based on available data has not exceeded the water quality standard for selenium.

South Fork Salmon PNRS-AU Translation Map: