

Blackbird Mine Site Group

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February 1, 2017

Paula Wilson
Idaho Department of Environmental Quality
1410 N. Hilton, Boise, ID 83706

Re: Blackbird Mine Site Group (BMSG) comments on *Draft Implementation Guidance for Idaho Copper Criteria for Aquatic Life, State of Idaho, Department of Environmental Quality, June 2017*

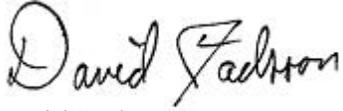
Dear Paula:

Thank you for the opportunity to review and comment on the above-referenced report. The Blackbird Mine Site Group (BMSG) offers the following specific comments for consideration by the Idaho Department of Environmental Quality:

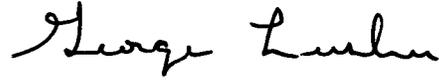
1. Sections 5.3.1 and 5.4.4 - The draft guidance document discusses collection of at least 12 monthly IWQC samples to address temporal or seasonal variability for development of single or seasonal criteria (Sections 5.3.1 and 5.4.4). Monthly samples may not be possible or practical for some situations. Some water quality monitoring locations in Idaho are not accessible during the winter due to ice cover and/or unsafe conditions. In Idaho mountain streams, low-flow conditions typically persist through the winter until the beginning of the spring thaw. Low-flow and wet season water quality conditions for BLM input parameters can be adequately assessed in many cases without sampling during the coldest winter months. We recommend that these sections be modified to indicate that monthly samples may not be possible in certain situations and to advise users to consider accessibility, flow data, and other site-specific information when determining the quantity and timing of sample collection needed to develop single or seasonal criteria.
2. Section 5.4 – The first sentence of this section explains that for time-specific results, users can compare a copper concentration to the BLM-derived criteria calculated for the same sample. This section should also clearly state that reconciling multiple IWQCs is not required if users analyze for BLM input parameters each time that a water sample is collected for comparison to the copper IWQC. This is common practice for the current hardness-based IWQC.

Please contact us if you have questions regarding these comments.

For the BMSG:



David Jackson
Project Coordinator



George Lusher
Project Coordinator

Transmitted electronically

cc: H. Harper
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