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Idaho Conservation League

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9/11/12

Lance Holloway
Idaho DEQ – Boise Regional Office
1445 N. Orchard St.
Boise, ID 83706

-- Delivered via email --

Dear Mr. Holloway;

As you know, the Idaho Conservation League is deeply interested in the development and implementation of a phosphorous TMDL for the Lower Boise River.

The Department of Environmental Quality (DEQ) recently solicited comments/information from interested parties regarding nutrient targets and metrics related to the development of the phosphorus TMDL.

Pursuant to this exercise, we would like to recommend that DEQ incorporate the relevant ambient water quality criteria for nutrients developed by the Environmental Protection Agency (EPA). See “Ambient Water Quality Criteria Recommendations, Information Supporting the Development of State and Tribal Nutrient Criteria, Rivers and Streams in Nutrient Ecoregion III.”¹ (This document is attached electronically to the email delivering this letter.)

In 2000, the EPA undertook the development of recommended nutrient criteria in order to provide States and Tribes with quantifiable targets for the development of nutrient standards to assess attainment of beneficial uses. These criteria were also developed for the explicit purpose of aiding in the establishment of targets for Total Maximum Daily Loads (TMDLs). As such, these EPA recommended criteria seem particularly relevant.

Recognizing that the 14 unique ecoregions utilized in its nationwide effort encompassed large areas and differing waterbody types, the EPA further divided each ecoregion into numerous sub-regions based on distinct local characteristics such as soils, vegetation, land use, precipitation, etc. As a result of this fine grained analysis, the recommendations specific to this portion of Southern Idaho are unique and specific to our natural and human influence environment.

EPA’s recommended total phosphorous criteria is 42.5 ug/L. We recommend that DEQ

¹ EPA 822-B-00-016, December 2000.

adopt this value as the TP target in the Lower Boise TMDL. Further, we believe, and the EPA document supports, that this target needs to be achieved on a year-round basis; not a seasonal basis.

EPA provides recommendations for additional parameters. We believe that it would be prudent for DEQ to similarly adopt these criteria. See below.

TKN (mg/L) 0.272, NO₂ + NO₃ (mg/L) 0.272, TN (mg/L) - calculated 0.544,
Turbidity (NTU) 1.538, Turbidity (FTU) 3.25, Chlorophyll **a** (ug/L)² 4.85,
Chlorophyll **a** (ug/L)³ 3.3, Periphyton Chl **a** (mg/m²) 43.9

Thank you for soliciting recommendations on the development of these important targets and metrics to be used in the development of the Lower Boise nutrient TMDL. We look forward to DEQ utilizing the materials that we have referenced above. The EPA's work on these issues is second to none; inclusion of criteria developed by the EPA seems prudent, as EPA will have some say in approving the TMDL that is developed.

Sincerely,



Justin Hayes
Program Director

² Chlorophyll a measured by Fluorometric method with acid correction.

³ Chlorophyll a b c measured by Trichromatic method.