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

March 8, 2013

Lower Boise Watershed Council

Subject:

Proposal to Modify the Lower Boise River Total Phosphorus TMDL, Benthic

Chlorophyll-a Target Period Based on Additional Analyses

Dear Council Members:

On January 10, 2013, the Lower Boise Watershed Council (LBWC) voted to support (2 opposed, 1 abstained) a modified version of the Idaho Department of Environmental Quality's (DEQ) proposed impairment target to be used in the lower Boise River (LBR) Total Phosphorus (TP) Total Maximum Daily Load (TMDL). Specifically, the LBWC voted to support:

- A mean benthic chlorophyll-a biomass target of $\leq 150 \text{ mg/m}^2$
 - O July 1 September 30 (as a placeholder in lieu of the proposed year-round target)
 - o In the impaired Assessment Units of the lower Boise River (tributaries not included)
 - o In "wadeable" portions of the river (typically < 1 m depth that can be safely sampled)

Recommended Target Revision

DEQ believes a mean benthic chlorophyll-a biomass target of $\leq 150 \text{ mg/m}^2$ will fully support Primary/Secondary Contact Recreation and Cold Water Aquatic Life beneficial uses on the LBR. However, LBR data demonstrates that benthic algae may continue growing and/or sustaining beyond September 30. Further, based discussion and feedback during the January 10 and 24, and February 14 and 28 LBWC and Technical Advisory Committee (TAC) meetings, DEQ recognizes that modeling efforts, conducted during the TMDL development may provide additional insight toward refining the periphyton target timeframe. As such, DEQ recommends the LBWC support:

- Removal of the July 1 September 30 target time period,
- Acknowledge that the benthic chlorophyll-a target time period will be developed and identified, including duration and frequency components, through modeling efforts in conjunction with LBR-specific data, scientific and technical literature, and with LBWC, TAC, and public input.

Sincerely,

Troy G. Smith

Watershed Coordinator

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