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Protecting and Restoring the Rivers and Fish of Idaho

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Comments of Idaho Rivers United on draft nutrient TMDL for the Boise River and Tribs

The Clean Water Act became the law of our nation because of the tremendous concern citizens have for the health of our rivers and other waters of the nation. People across American were witnessing the rampant pollution of their waterways, they were unable to swim or fish in the water, rivers were becoming stinking nuisances, not recreational and natural resources. They demanded action. It is the commitment that Congress and the President made to the citizens of the United States to restore and maintain the chemical, physical and biological integrity of the waters of the US, including the Boise River that drives this process. It's one that all of us must take very seriously.

Idaho Rivers United supports the adoption of a TMDL for total phosphorus in the lower Boise River and Mason Creek and Sand Hollow Creek. Nutrients are polluting those waterways and impairing beneficial uses. IRU agrees with the sources of TP pollutant listed in the draft TMDL.

IRU support the two TMDL targets, one for TP concentrations May 1 – Sept. 30 and one for mean monthly benthic chlorophyll a. We agree that the TP loadings should achieve both the SR-HC TMDL and lower Boise River mean monthly periphyton target.

Idaho Rivers United believes the allocation for point sources for May – September should be 0.07 mg/L not 0.1 mg/L. NPDES permits for point sources have already been issued in the watershed that contain the 0.07 mg/L limits and, across the country, many permits contain this limit, so it's clearly not unreasonable. Point source dischargers have already invested in planning and study to meet that requirement. Why back away from it? For better or worse, point source reductions, however they are achieved, are the most reliable and they should therefore be as stringent as justified.

Idaho Rivers United supports establishment of TP load allocations for October 1 – April 30. USGA data show that algae grows throughout the year when conditions are right. Also, phosphorus persists in the aquatic ecosystem for months, if not years. There should never be a "free" period when phosphorus can be discharged without restriction into the Boise River. River conditions during this time period should be closely monitored and more research conducted in coming years to augment the existing limited data and body of knowledge to better inform decision makers during the five-year TMDL review.

Comments submitted by Liz Paul, liz@idahorivers.org