

Michelle Dale

From: Bassista, Tom <thomas.bassista@idfg.idaho.gov>
Sent: Tuesday, June 30, 2020 4:04 PM
To: Michelle Dale
Cc: Edelmann, Frank; Cassinelli, John; Brian Reese
Subject: RE: DEQ 2020 Triennial Review - IDFG comments

Dear Michelle,

Thank you for the opportunity to review the DEQ 2020 Triennial Review recommendations/proposals.

Please note that IDFG's mission is to protect, preserve, and manage Idaho's fish and wildlife resources for the public interest (Idaho Code 36-103).

Please consider IDFG's following technical comments/recommendations based on the public meeting held May 19, 2020 and review of DEQ produced Issue Papers (located via websites below).

Comparison of Current Idaho Aquatic Life Criteria for Ammonia and EPA §304(a) Recommended Criteria

- IDFG has no comments on the criteria for ammonia and will defer to DEQ to make the most informed decision to protect Idaho's aquatic life.

Salmonid Spawning Use Designation

- IDFG wants to ensure the DEQ is using the most recent fish abundance and/or fish population data set. Brian Reese can contact me (Tom Bassista), to verify he has the most up-to-date data.
- IDFG recommends that DEQ moves forward with a potential test case to determine if DEQ should designate salmonid spawning in a central Idaho watershed(s).

Jacks Creek Aquatic Life Beneficial Use Designation

- IDFG concurs that DEQ should complete a use attainability analysis of Jacks Creek to help identify the highest attainable aquatic beneficial use designation. We recommend that DEQ works closely with IDFG's Southwest Regional Fisheries program for any fish data or sampling needs. Please contact John Cassinelli, Regional Fisheries Manager to help assist with these efforts.

EPA §304(a) Recommended Criteria—Microcystins and Cylindrospermopsin

- IDFG has no comments on whether or not DEQ should consider rulemaking to adopt numeric microcystin and cylindrospermopsin water quality criteria. IDFG has anecdotally observed that outbreaks of cyanobacteria in certain Idaho water bodies have decreased angling use. IDFG is concerned of the increase in cyanobacteria or harmful algal blooms and what impacts they may have on recreational fishing.

Data and Information Needs Necessary for the State of Idaho to Consider Adoption of EPA 304(a) Aquatic Life Criteria for Mercury

- IDFG has no comments. IDFG recommends DEQ work closely with Idaho Department of Health and Welfare for determining the best course of action for adopting EPA Aquatic Life Criteria for Mercury.

Performance-based Approach for Temperature Criteria

- IDFG has no comment on whether or not DEQ should prioritize development of a performance based temperature criteria. IDFG recommend analyzing one or more water bodies using the performance based

approach and existing temperature criteria methodology to help better understand the advantages and disadvantages of both methods.

Thank you for the opportunity to review and provide comments on DEQ's 2020 Triennial Review process.

Please contact me if you have any questions.

Sincerely,

Tom Bassista
Technical Assistance Program Coordinator
Idaho Department of Fish and Game
Headquarters Office
PO Box 25
600 South Walnut
208-610-4032 cell



<https://idfg.idaho.gov>

Triennial Review

An update for the May 19 meeting is posted below as a DEQ cloud link.

Public Meeting

To comply with the CWA, DEQ will hold a public meeting to engage stakeholders and identify priorities for WQS rulemaking and sub-program development for the next three-plus years.

The public meeting is scheduled for May 19, 2020, from 6 to 9 p.m. MDT. Meetings will be held remotely to comply with Governor Little's [proclamation](#).

Contact [Michelle Dale](#) for telephone and web conferencing information.

Public Comment Opportunities

Submit all written comments by mail, fax or email to Michelle Dale:

Michelle Dale
Idaho Department of Environmental Quality
1410 N. Hilton, Boise, ID 83706
Fax: (208) 373-0576
Email: michelle.dale@deq.idaho.gov

Presentation

[2020 Triennial Review - DEQ PowerPoint Presentation](#)

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<p style="text-align: center;">Presentation</p>	<p style="text-align: center;">Da Me Disc</p>
<p>https://cloud.deq.idaho.gov/s/3dJXxWpBqaRtwXp</p>	<p style="text-align: center;">2</p>
<p>Issue Paper: EPA §304(a) Recommended Criteria—Microcystins and Cylindrospermopsin</p>	<p style="text-align: center;">Ma 2</p>
<p>Issue Paper: Comparison of Current Idaho Aquatic Life Criteria for Ammonia and EPA’s §304(a) Recommended Criteria</p>	<p style="text-align: center;">Ma 2</p>
<p>Issue Paper: Salmonid Spawning Use Designation</p>	<p style="text-align: center;">Ma 2</p>
<p>Issue Paper: Data and Information Needs Necessary for the State of Idaho to Consider Adoption of EPA 304(a) Aquatic Life Criteria for Mercury</p>	<p style="text-align: center;">Ma 2</p>
<p>Issue Paper: Lower Snake - Asotin Subbasin (HUC 17060101) Salmonid Spawning Use Designation</p>	<p style="text-align: center;">Ma 2</p>
<p>Issue Paper: Jacks Creek Aquatic Life Beneficial Use Designation</p>	<p style="text-align: center;">Ma 2</p>
<p>Issue Paper: Performance-based Approach for Temperature Criteria</p>	<p style="text-align: center;">Ma 2</p>
<p>Workshop Presentation 2020 Triennial Review of Idaho Water Quality Standards</p>	<p style="text-align: center;">Ma 2</p>