



## REGION 10

SEATTLE, WA 98101

July 22, 2025

Dr. Mary Anne Nelson  
Administrator  
Surface and Wastewater Division  
Idaho Department of Environmental Quality  
1410 N. Hilton Street  
Boise, Idaho 83706  
*Mary.Anne.Nelson@deq.idaho.gov*

Dear Dr. Nelson:

The U.S. Environmental Protection Agency has completed its review of Idaho's 2024 Integrated Report, including the Clean Water Act Section 303(d) list of impaired waters, and the associated supporting documentation and information. The EPA initially received Idaho's 2024 Integrated Report and 303(d) list submission from the Idaho Department of Environmental Quality on March 12, 2025, through ATTAINS.<sup>1</sup> IDEQ subsequently revised the Integrated Report and resubmitted the 2024 Integrated Report and 303(d) list through ATTAINS on March 14, 2025, and April 1, 2025.

The EPA regulations at 40 CFR 130.7(b)(1) allow a state to exclude segments on the Section 303(d) list if "[o]ther pollution control requirements (e.g., best management practices) required by local, State, or Federal authority" are stringent enough to implement applicable water quality standards within a reasonable period of time. These waters are included in Category 4b in a state's Integrated Report.<sup>2</sup> IDEQ provided a 4b demonstration addressing metals (lead, zinc, and cadmium) in the South Fork Coeur d'Alene River in Appendix C of the 2024 Integrated Report. The 4b demonstration included the 39 water quality limited segments shown in the table below.

As described in the decision document for the EPA's action on Idaho's 2024 303(d) list, July 22, 2025, the EPA accepts the state's decision to move the 39 WQLSs included in the 4b demonstration from Category 5 to Category 4b; thus, removing them from the 303(d) list. In reviewing the 4b demonstration, the EPA notes there are three administratively continued Idaho Pollutant Discharge Elimination System permits (i.e., ID0000167, ID0000060, and ID0025429) for mining facilities with inactive operations that are identified as a 2025 Priority in the IPDES Permit Issuance Plan. Through

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<sup>1</sup> The Assessment, Total Maximum Daily Load (TMDL) Tracking and Implementation System (ATTAINS) is the EPA's electronic system to accept and track CWA Section 303(d) submissions and Agency actions.

<sup>2</sup> EPA 2008 Integrated Reporting Memorandum at 7; [https://www.epa.gov/sites/default/files/2015-10/documents/2006\\_10\\_27\\_tmdl\\_2008\\_ir\\_memorandum.pdf#page=7](https://www.epa.gov/sites/default/files/2015-10/documents/2006_10_27_tmdl_2008_ir_memorandum.pdf#page=7).

communication and coordination with IDEQ staff, we understand that the IPDES program will prioritize these permits for reissuance if and when operations resume.<sup>3</sup> To ensure consistency with the priorities of the 4b demonstration, IDEQ must make progress towards reissuing the permit(s) prior to resumed activities at each site and ensure the permits comply with all applicable water quality standards, including the current site-specific water quality criteria for lead, zinc, and cadmium. If progress is not made, then either IDEQ or the EPA may determine that circumstances have changed such that the original 4b demonstration can no longer be supported and the WQLSs will be moved back to Category 5.<sup>4</sup>

Assessment Unit ID	Assessment Unit Name	Parameter
ID17010302PN001_02	South Fork Coeur d'Alene River - Tributaries below Placer Cr	ZINC
ID17010302PN001_02	South Fork Coeur d'Alene River - Tributaries below Placer Cr	CADMIUM
ID17010302PN001_02	South Fork Coeur d'Alene River - Tributaries below Placer Cr	LEAD
ID17010302PN001_03	South Fork Coeur d' Alene River-btw Placer Cr. and Big Cr.	ZINC
ID17010302PN001_03	South Fork Coeur d' Alene River-btw Placer Cr. and Big Cr.	CADMIUM
ID17010302PN001_03	South Fork Coeur d' Alene River-btw Placer Cr. and Big Cr.	LEAD
ID17010302PN001_03a	South Fork Coeur d'Alene River-Canyon Creek to Placer Creek	LEAD
ID17010302PN001_03a	South Fork Coeur d'Alene River-Canyon Creek to Placer Creek	CADMIUM
ID17010302PN001_03a	South Fork Coeur d'Alene River-Canyon Creek to Placer Creek	ZINC
ID17010302PN001_04	South Fork Coeur d'Alene River - btw Big Cr and Pine Cr	ZINC
ID17010302PN001_04	South Fork Coeur d'Alene River - btw Big Cr and Pine Cr	CADMIUM
ID17010302PN001_04	South Fork Coeur d'Alene River - btw Big Cr and Pine Cr	LEAD
ID17010302PN001_05	South Fork Coeur d'Alene River - btw Pine Cr and CdA River	ZINC
ID17010302PN001_05	South Fork Coeur d'Alene River - btw Pine Cr and CdA River	CADMIUM
ID17010302PN001_05	South Fork Coeur d'Alene River - btw Pine Cr and CdA River	LEAD
ID17010302PN002_04	Pine Creek - East Fork Pine Creek to South Fork CdA River	CADMIUM
ID17010302PN002_04	Pine Creek - East Fork Pine Creek to South Fork CdA River	LEAD
ID17010302PN002_04	Pine Creek - East Fork Pine Creek to South Fork CdA River	ZINC
ID17010302PN004_02	East Fork Pine Creek headwaters and tributaries	LEAD
ID17010302PN004_02	East Fork Pine Creek headwaters and tributaries	ZINC
ID17010302PN004_02	East Fork Pine Creek headwaters and tributaries	CADMIUM
ID17010302PN004_03	East Fork Pine Creek below Douglas Creek	LEAD
ID17010302PN004_03	East Fork Pine Creek below Douglas Creek	ZINC
ID17010302PN004_03	East Fork Pine Creek below Douglas Creek	CADMIUM
ID17010302PN006_02	Government Gulch	CADMIUM
ID17010302PN006_02	Government Gulch	LEAD
ID17010302PN006_02	Government Gulch	ZINC
ID17010302PN014_02	Canyon Creek - from Gorge Gulch to South Fork CdA R.	ZINC
ID17010302PN014_02	Canyon Creek - from Gorge Gulch to South Fork CdA R.	CADMIUM

<sup>3</sup> Letter from Dan Eardley, Federal Reporting Lead, IDEQ, to Michelle Maier, EPA Water Quality Assessment Coordinator, dated April 7, 2025.

<sup>4</sup> 2006 Integrated Reporting Memorandum at 55. "EPA may determine that a segment that has been placed into Category 4b must go back into Category 5, if the circumstances have changed such that the state can no longer support its original 4b demonstration." <https://www.epa.gov/sites/default/files/2015-10/documents/2006irg-report.pdf#page=57>.

ID17010302PN014_02	Canyon Creek - from Gorge Gulch to South Fork CdA R.	LEAD
ID17010302PN016_02	Ninemile Creek and tribs except Ninemile Cr above East Fork	LEAD
ID17010302PN016_02	Ninemile Creek and tribs except Ninemile Cr above East Fork	CADMIUM
ID17010302PN016_02	Ninemile Creek and tribs except Ninemile Cr above East Fork	ZINC
ID17010302PN018_02	Moon Creek headwaters and tribs except West Fork Moon Cr	CADMIUM
ID17010302PN018_02	Moon Creek headwaters and tribs except West Fork Moon Cr	ZINC
ID17010302PN018_02	Moon Creek headwaters and tribs except West Fork Moon Cr	LEAD
ID17010302PN018_03	Moon Creek btw West Fork Moon and South Fork CDA River	CADMIUM
ID17010302PN018_03	Moon Creek btw West Fork Moon and South Fork CDA River	ZINC
ID17010302PN018_03	Moon Creek btw West Fork Moon and South Fork CDA River	LEAD

If you have any questions, please feel free to contact me at (206) 553-0171 or [shaw.hanh@epa.gov](mailto:shaw.hanh@epa.gov), or have your staff contact Kati Carberry, EPA TMDL Coordinator, at (208) 378-5771 or [carberry.kathryn@epa.gov](mailto:carberry.kathryn@epa.gov), or Michelle Maier, EPA Assessment Coordinator, at (503) 326-6994 or [maier.michelle@epa.gov](mailto:maier.michelle@epa.gov).

Sincerely,

Hanh Shaw, Manager  
Standards, Assessment and Watershed  
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Water Division

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