Bear River - Cutler Reservoir TMDL

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#### Cutler Reservoir and Bear River Study Area 27 D Main Stem Bear River Cub River on Creek Logan River SUMMIT DAGGE Ashley N.I TOOELE UINTAH Spring JUAB Blacksmith Fork CARBON SANPET Little Bear River MILLARD GRAN SEVI BEAVER UTE WAYNE RO GARFIELD Little Bear River Logan River Newton Creek 0 SWCA











# History

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- Original Bear River TMDL/ approved in 1991 established phosphorus endpoint of 0.05 mg/l for Cutler
- Lower Bear River TMDL approved in 2002 identified phosphorus endpoint of 0.075 mg/l below Cutler
- Currently revised TMDL approved in 2010 with endpoint of 0.09 mg/l.
- Advisory committee formed in 2004



### Process

#### Representative and engaged technical committee

- 69 advisory committee meetings over 5 years
- Representation from diverse constituencies
- Comprehensive data collection
  - Supplemental data and studies completed at request of advisory committee
  - Data from Logan City, PacifiCorp and USU
    - o 1,498 TP data points
    - o 114 Chlorophyll *a* data points
    - o 3,584 dissolved oxygen data points
    - o 33 sites

# Thorough public review process

- 21 comment letters (157 comments)
- Substantive changes to analysis and TMDL as a result of public comments



# Fishery Use is Impaired

### OPrimary Evidence

- Continuous data collected at 9 locations over 6 sampling periods (163 days)
- 25% of samples violate early life-stage DO standard
- 15% of samples violate all life-stage DO standard
- Follows removal of disputed data



### DO concentrations in Cutler **Reservoir and Fish Spawning Periods**



# **Recreational Use is Impaired**

### • Primary evidence

- 26% of chlorophyll a data in Cutler Reservoir are >30  $\mu$ g/L
- Recreation user surveys: Half consider water quality in Cutler to be a moderate to big problem

### Additional concerns

• Possibility of blue-green algae further threatens this use



### Water-oriented wildlife (3D

#### • Primary evidence

• 15% of samples exceed dissolved oxygen standard for aquatic life specific to 3D use

#### • Importance of Cutler wetlands

- Wetlands around Cutler nominated by the Audubon Society as an Important Bird Area (IBA)
- 25 bird species at Cutler feed on taxa that are NOT tolerant of hypereutrophic conditions
- Cutler Reservoir is dominated by macroinvertebrate taxa tolerant of eutrophic conditions

### Linkages

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#### Dissolved oxygen impairment (25% of data violate standard)

- Diurnal pattern of DO indicates nighttime algal respiration
- High algal concentrations in Cutler Reservoir (max over 1,000



ug/L chlor phyll a)

### Current Sources

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# Phosphorus Endpoints

	Winter	Summer
Middle Bear River	0.05 mg/l	0.05 mg/l
Southern Reservoir	None	0.09 mg/l
Northern Reservoir	0.075 mg/l	0.07 mg/l

- Middle Bear River TMDL set endpoint for Bear River above Cutler at 0.05 mg/l
- Lower Bear River TMDL set endpoint of 0.075 mg/l at Cutler Dam year round
- Summer endpoints derived from multiple lines of evidence

### **TMDL Conclusions and Current Status**

- Cutler Reservoir's beneficial uses are impaired
- Linkage between DO and TP is well established, despite some uncertainty
- TMDL analysis was scientifically credible and rigorous
- Process included multiple stakeholders with extensive involvement
- Phased TMDL approach was selected to address uncertainty
- Monitoring plan has been developed to better define water quality endpoints
- Adaptive implementation efforts have begun to control pollutant sources

# Uncertainty

### • Uncertainty and TMDLs

- All TMDLs and all scientific analyses have uncertainty
- Good science acknowledges and discloses complexity and uncertainty
- Water quality models are more 'precise' and quantitative but not necessarily more accurate
- Margin of Safety (MOS) in TMDLs accounts for uncertainty
- Cutler TMDL selected a Phased Approach to avoid 'over-regulating' during this iteration

# Cutler Uncertainty

### • Sources of uncertainty in Cutler Reservoir

- Lack of paired TP-Chl a DO datasets to quantify Cutler specific TP – DO linkage
- Unique nature of Cutler Reservoir system:
- Shallow depth and wetland habitat
- Turbidity interference with algal growth
- Tributary TMDL attainment (5 in watersheds)

Phased Approach and Adaptive management
Continue to monitor the system

## **TIMDL** Allocations

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#### Cutler TMDL Load Analysis

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All units Kg/Season Cur		ent Load	TMDL Allocated Load		Load Reduction		Percent Reduction	
	Summer	Winter	Summer	Winter	Summer	Winter	Summer	Winter
Logan WWTP	11,236	21,597	4,405	11,831	6,831	9,766	61%	45%
Irrigation flow to Cutler from WWTP							61%	45%
effluent Total Southern	18,062	1,953	7,082	1,070	10,980	883		
Reservoir	71,201	62,622	25,539	28,986	45,662	33,636	64%	54%
Total Northern Reservoir	127,402	119,829	62,103	63,461	65,299	56,368	51%	47%

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# Logan City

### • Largest discharger of TP in Bear River basin

- Hyrum, Richmond, and Lewiston upgraded
- Idaho municipalities are in compliance
- TP loads at stateline are in compliance

### • TMDL effluent limits

- Effluent concentration of 1.3 to 1.9 mg/l (from 3.4 3.7 mg/l)
- Water quality trading during the winter is permitted
- Other WWTP in the state meet a 0.1 mg/l effluent target

### • Costs of compliance

- Tertiary treatment is NOT required to meet TMDL
- Estimated cost to comply is \$5 million (CH2MHill 2010)
- Agriculture has spent more than \$10 million since 1990
- Logan City is moving forward
  - Retained a design engineer to upgrade WWTP



