STATEWIDE TMDL ADVISORY GROUP (STAG) MEETING SUMMARY

DECEMBER 01, 2025

Hybrid Meeting: DEQ Colonial Building Wilderness Room and via Zoom
1:30 p.m.

To supplement this meeting summary, see **Attachment A** for a copy of the presentation given by DEQ. Both this summary and the meeting agenda can be found on the Department of Environmental Quality's (DEQ) Water Advisory Councils & Work Groups webpage at: https://deq.mt.gov/water/Councils

ATTENDANCE: STAG MEMBERS

STAG Member & Affiliation	Representing
Karli Johnson Montana Farm Bureau	Farm-Oriented Agriculture
Ellie Brighton Montana Stock Growers Association	Livestock-Oriented Agriculture
Brian Sugden Sugden Forest Environmental	Forest Industry
Brian Heaston City of Bozeman	Point Source Dischargers
Scott Mason subbing for Greg Bryce Hydrometrics	Mining
Andy Efta U.S. Forest Service	Federal Land Management Agencies
Jeff Schmalenberg Department of Natural Resources & Conservation	State Trust Land Management Agencies
Jordan Tollefson Northwestern Energy	Hydroelectric Industry
Michael Bias Fishing Outfitters Association of Montana	Fishing-Related Business

ATTENDANCE: OTHER PARTICIPANTS

Aaron Losing, City of Kalispell
Amy Deitchler, Great West Engineering
Andy Ulven, DEQ, Water Quality Planning Bureau Chief
Ben Catton, Montana Environmental Information Center
Casey Lewis, Montana Department of Natural Resources and Conservation
Christina Staten, DEQ, TMDL Section Supervisor
Darrin Kron, DEQ, Monitoring and Assessment Section Supervisor
Ella Bushnell, DEQ, Monitoring and Assessment Section
Eric Trum, EPA Region 8, Montana Nonpoint Source Contact
Erin Eberhard, DEQ, Monitoring and Assessment Section
Gabby Metzner, DEQ, Monitoring and Assessment Section
Gabe Johnson, Navajo Transitional Energy Company

Hannah Adkins, DEQ, TMDL Section
Hannah Riedl, DEQ, Nonpoint Source and Wetlands Section Supervisor
Jeff Dunn, no affiliation provided
Joe Schrader, City of Kalispell
Joe Vanderwall, DEQ, TMDL Section
John Iverson, Treasure State Resources Association
Katie Makarowski, DEQ, Water Quality Standards and Modeling Section Supervisor
Kyle Milke, DEQ, TMDL Section
Laura Collins, no affiliation provided
Leea Anderson, City of Helena
Lindsey Krywaruchka, DEQ, Water Quality Division Administrator
Logan McInnis, City of Missoula
Margarite Thomas, no affiliation provided
Mary Harlow, no affiliation provided
Matt Elsaesser, Upper Missouri Waterkeeper
Madzic, no affiliation provided
Patrick Kelly, Western Watersheds
Paul Yakawich, DOWL
Peter Brumm, EPA Region 8, Montana TMDL Contact
Rickey Shultz, HDR
Rosalyn DiLillo Knock, no affiliation provided
Susie Turner, City of Kalispell
Tiffany Lyden, DEQ, Nonpoint Source and Wetlands Section
Troy Clift, DEQ, TMDL Section
Vicki Marquis, Holland and Hart
Vicki Watson, University of Montana Watershed Clinic

MEETING INITIATION

Christina Staten, DEQ's TMDL Section Supervisor, called the meeting to order at 1:33 pm and went over meeting logistics and Zoom controls. There was a round of introductions of the participants in the room and Christina conducted a roll call of STAG members in attendance via Zoom. The meeting agenda was then reviewed.

EPA ACTION ON HB664 (RETURN TO NARRATIVE NUTRIENT STANDARDS)

Andy Ulven, Department of Environmental Quality's (DEQ's) Water Quality Planning Bureau Chief gave an overview of EPA's action on House Bill 664. House Bill 664 repealed department Circular DEQ-12A, the numeric nutrient standards, and the Environmental Protection Agency (EPA) approved it as a water quality standards change on October 3, 2025. All waterbodies of the state where Circular DEQ-12A applied now fall under the narrative standard for nutrients; this always excluded two segments on the upper Clark Fork River. DEQ has developed a process based on the best available science that will be used for permitting decisions, total maximum daily loads (TMDLs), and beneficial use assessments. The process emphasizes biological responses/effects more than nutrient concentrations. This is the first time since Senate Bill 358 in 2021 that both state and federal regulations for nutrients match, so we can move forward with issuing permits, completing TMDLs, and assessing waterbodies.

REVIEW OF EPA COMMITMENTS PROCESS AND TIMELINES

Christina Staten reviewed how TMDL priority rankings work, **Attachment A,** slide 7. The priorities are categorized in the Integrated Report (IR) as high, medium, or low. For the current draft 2022/2024 IR currently out for public comment, the priorities were based on the EPA commitments for 2022 and 2024. The priorities correspond to commitments made to EPA every two years, due in September of even-numbered years. Hight priority projects are to be completed by the EPA commitment date and medium priority projects are flexible. Medium priority projects can become high priorities or low priorities. Low priority projects do not have a timeline for completion.

The 2026 draft IR will contain new TMDL priority rankings based off today's discussions. DEQ will need to communicate new commitments for 2028 to EPA in September 2026. Also, the current high priority projects (Beaverhead and Red Rock TMDLs, and Ashley Creek TMDL revisions) are due in September 2026.

WATER QUALITY MONITORING AND ASSESSMENT UPDATES

Darrin Kron, DEQ's Monitoring and Assessment Section Supervisor, stated that his section produces the Integrated Report (IR) on a biannual basis. This 2022/2024 IR is a combined cycle. The Monitoring and Assessment Section also manages the Volunteer Monitoring Program and assesses waterbodies.

Darrin gave an overview of the recent assessment methods updates, **Attachment A** slide 10. The recent assessment methods updates were for dissolved oxygen, ammonia, and Lake Koocanusa/Kootenai River selenium. The public comment period for these assessment methods was August to October 2024.

The dissolved oxygen assessment method's daily and weekly minima standards may be overly stringent which could likely result in listing a lot of reference sites. Darrin stated that the Monitoring and Assessment Section is currently working with the Standards and Modeling Section on a pathway forward to help resolve this issue. The draft dissolved oxygen assessment method was not used for the 2022/2024 IR because of this. The Lake Koocanusa/Kootenai River Selenium assessment method is on pause due to ongoing litigation.

The ammonia assessment method is now finalized, public comment was addressed, resulting in clarity and details be added. The final ammonia assessment method is posted on DEQ's webpage: https://deq.mt.gov/water/Programs/Monitoring.

A new pH assessment method is currently out for public comment alongside the 2022/20224 IR, and it is implemented within this IR. Darrin said that DEQ will adjust listings if needed and address public comments when they are received.

Now that federal and state nutrient standards align, DEQ will be pursuing nutrient assessment methods for wadeable streams, lake/reservoirs, and large rivers. DEQ is still working on the temperature assessment method, but it is well underway, and a draft is mostly complete. DEQ already has metals/toxics assessment methods, but will be updating them. Darrin said that the Monitoring and Assessment Section is looking at a fish tissue assessment method in coordination with the Montana Department of Fish, Wildlife & Parks and the Montana Department of Public Health and Human Services to rectify fish consumption advisories. Lastly, the sediment and habitat assessment method and sulfate assessment methods need to be updated.

Darrin mentioned that everyone should have received notifications via email or news that DEQ has the draft 2022/2024 Integrated Report out for public comment which is open through January 15, 2026. The draft 2022/2024 IR also includes a call for data for the 2026 IR. The call for data targets all available data, which includes DEQ projects, volunteer monitoring, and the United States Geological Survey. Current calls for data are for the East Gallatin River; Ashley Creek; Kootenai River; Lake Koocanusa; and Fairway, Stanley, and Lake creeks in the Kootenai River watershed.

The draft 2022/2024 IR contains an assessment of existing assessment methods plus the upcoming pH assessment method. Postponed assessment methods include nutrients/eutrophication, dissolved oxygen, and Lake Koocanusa/Kootenai River Selenium. In the draft 2022/2024 IR, there is a map (**Attachment A**, slide 13) that shows waters in light blue that were assessed during this cycle.

Darrin gave an overview of current assessment locations, areas where monitoring will continue in 2026, and areas where monitoring is currently paused, **Attachment A**, slide 14. Waterbodies currently under the assessment phase include the Yellowstone River, Clarks Fork of the Yellowstone River, Upper Missouri River down to the Marias River confluence, Deep Creek for sediment, and the Smith River. There will be other assessment units that DEQ deals with through the readily available components.

Monitoring in 2026 will be continued on the Big Hole and Gallatin rivers for nutrient response variables. DEQ will be working with local entities to target monitoring algae conditions and other response variables in the Big Hole River. The same will be happening for the Gallatin River if excessive algae blooms occur. Currently the Canyon Ferry tributaries and Goat Creek turbidity/total suspended solids monitoring is paused.

DISCUSSION

Brian Sugden, forest industry representative, asked Darrin Kron on the assessment phase, for the Yellowstone River, were there not site-specific standards set as part of the large waterbody process years ago? Darrin replied that there were in Circular DEQ-12A, but they are now narrative. Brian followed up by asking if the site-specific standards were done with? Darrin responded that yes, except for portions of the upper Clark Fork River. The Yellowstone River had both numeric and narrative standards, but they are all narrative now because of House Bill 664. There are some data gaps on the Yellowstone River for eutrophication assessment, DEQ may not have all the response variables that are needed to do an assessment.

Christina Staten asked if there were any questions so far. Brian Sugden asked for the Yellowstone River, was the large rivers process underway an attempt to translate the narrative standard to a numeric value in a site-specific way? How is that going to differ in the future on large rivers if not sort of translated?

Andy Ulven responded that department Circular DEQ-12A contained numeric nutrient criteria from the Big Horn River confluence down to the state line. Yes, there was lots of modeling for site specific criteria, but those have been repealed. The work and science behind the derivation will be factored into whatever decisions DEQ is making.

Katie Makarowski, DEQ's Standards and Modeling Section Supervisor clarified that department Circular DEQ-12A repealed all numeric criteria adopted in the circular. However, some waterbodies have site specific standards that were adopted in separate rules for Montana, therefore they have not been

repealed. Darrin mentioned that DEQ is continuing modeling on the Upper Yellowstone River to use in a narrative approach also.

TMDL Projects and Future Priority Projects

Christina Staten overviewed how commitments to EPA work, **Attachment A**, slide 16. DEQ submits TMDL commitments to EPA every two years. These commitments can be "in development" or "complete." EPA recommends that if a commitment is "in development" for one two-year cycle, it should be completed by the next two-year cycle. The TMDL commitments are also reflected in the TMDL priority rankings in the IR discussed earlier.

Christina stated that current TMDL commitments are all nutrient related and they are due to EPA on September 30, 2026. The current TMDL commitments are Beaverhead River watershed nutrients, which has 28 TMDLs (committed to complete), the Red Rock watershed nutrients, which has 30 TMDLs (committed to complete), and the Ashley Creek nutrient and sediment revisions, which has 8 TMDLs that are being revised within the Flathead-Stillwater document published in 2014 (committed to in-development). These projects have draft documents currently that DEQ has been sitting on because the status of nutrient standards has been in flux. Now DEQ is moving forward selecting new target values, using a site-specific process, the same one Andy mentioned earlier. DEQ will be putting out drafts of these documents for stakeholder and STAG review prior to the public comment period.

Christina also presented the TMDL prioritization factors for new projects, **Attachment A**, slide 18. The factors listed are not necessarily in order, but the new individual discharge permit applications are a top priority, especially if they are on impaired waterways without a TMDL, and they will be discharging a pollutant for which it is impaired. State law says that DEQ has 180 days to develop a TMDL or negotiate with permittee to develop a timeline for TMDL completion.

TMDL implementation considerations are another factor. DEQ looks to see if there are watershed groups that will implement the TMDL document recommendations. Program coordination is a factor where DEQ works with sister agencies and programs within DEQ to consider their priorities. Resource value, potential impact to use, impairment characteristics, court determination, and general waterbody characteristics prioritization factors are applicable to all watersheds. For an example of the resource value prioritization factor, think of the Gallatin River, it is considered a high resource stream because of blue ribbon trout fishing. DEQ looks at the value of the resource and prioritizes it accordingly. Potential impact to use evaluates how much beneficial uses are going to be impacted. An example of this is livestock impacted by high salinity levels that may be dying because of it. Court determination priority factors are if a court has ordered DEQ to develop a TMDL.

STAG Input on Future Monitoring and TMDL Projects

Christina Staten asked for input from STAG members on the future monitoring and TMDL projects. Chrsitina stated that after hearing from the STAG members, she will show a slide (**Attachment A,** slide 20) that has the potential TMDL priorities that the department has come up with.

DISCUSSION

Brian Sugden asked: in reference to the heading on the prioritization factors slide saying "new projects" (**Attachment A**, slide 18), if that comes into play in terms of whether there is an existing TMDL that supplements a permit or other things like if it is a new project? Christina Staten responded that this still applies to TMDL revisions, DEQ has to also prioritize revisions and would like the STAG's input.

Karli Johnson, farming-oriented agriculture representative, asked if DEQ has new discharge permits on the table that will affect these priorities. Christina responded that there may be one coming in soon for the lower most section of the Blackfoot River before its confluence with the Clark Fork River. However, they have not applied for a surface water discharge permit yet. They do have a groundwater permit, but that does not trigger TMDL development. It is possible this new permit will affect the Voluntary Nutrient Reduction Program (VNRP) document; however, it has not been decided if this permit will be a part of the VNRP updates or the lower Blackfoot River TMDL document revisions.

Peter Brumm, EPA Region 8, asked what about Belt Creek? Christina responded that there is a new permit that was just issued to the state of Montana to operate a water treatment facility on Belt Creek outside of Great Falls. DEQ will be working on revisions to the Missouri-Cascade and Belt TMDL document as a result which was approved in the mid 2000's. Since the new permit falls under the "new, individual discharge permit application" prioritization factor, and is on a stream for which there are currently TMDLs, the document will need to be revised to assign a wasteload allocation (WLA) to the permittee.

Christina asked if anybody wanted to kickoff feedback on the future priorities.

Jordan Tollefson, hydroelectric industry representative, asked if Christina had a slide with all the TMDLs completed and the ones that have not been, stating that this could be a good reference. Christina Staten responded by showing the map on **Attachment A**, slide 17. The areas in green are areas DEQ have worked before. In the materials provided to STAG members prior to the meeting there is a hyperlink to a map, to see where we have worked. The areas in orange have completed TMDLs but DEQ is still currently working in, these are the Beaverhead River watershed, Red Rock watershed, and the Ashley Creek watershed (Flathead-Stillwater document revision).

Jordan said that there is a fair amount of data that has been collected on the Yellowstone River recently, and that any other watersheds DEQ has significant data for seems like would be a higher priority to wrap up before data gets too old. Christina asked if for the Yellowstone River is Jordan thinking of specific pollutant groups or the river in general. Darrin Kron stated that DEQ has collected nutrients, metals, and common ions, if DEQ was to pursue nutrients it would need to collect more response variable data, there are some areas DEQ has the available data and others not. Some data is 12-15 years old for the response variables, that was used to populate models. While that data may be good for modelling it may not represent current conditions.

Karli stated that she did not have a lot of specific feedback. There's no specific policy that the Montana Farm Bureau has where that drives where they would like to see TMDL development. Karli mentioned that she would like to see the process be based on sound science, using good data that is available. She stated that if she hears things from members, that she will bring them to the STAG's attention.

Brian Sugden stated that there was a flurry of TMDL development in the 2005 to 2015 timeframe. He asked if that now that the dust has settled on the nutrient standards issue, how much cleanup of the existing realm of TMDLs is out there. Reverting to the narrative criteria has probably created a fair amount of work to get the house in order.

Christina responded that for TMDL documents with WLAs to permitted point sources, revisions will be necessary at some point. Revisions are prioritized when there is a water quality standards change. For example, for Ashley Creek, DEQ updated the model for TMDL development, and the model showed different loading from sources, so DEQ needed to revise the document to reflect what the new model shows. Yes, the list of TMDLs that was sent out in pre-meeting materials needs to be eventually revised, however DEQ does not have the capacity to do it all at once. DEQ will need to use the prioritization factors and STAG input to determine what TMDLs DEQ should be developing that are new that have been monitored recently. Chrstina stated that DEQ wants to do a mix of new TMDLs and revisions to TMDLs.

Andy Ulven stated that in addition, one of the priority factors is the program coordination piece. The Water Protection Bureau has a list of permits that are administratively continued and the TMDL section is coordinating with them. Based on the list of what has been the longest administratively continued permit is a factor Christina is aware of.

Ellie Brighton, livestock-oriented agriculture representative, stated that she did not have any input to give on priority projects or areas. Ellie stated that she appreciates the emphasis on best available science that is used as approach to the TMDL process.

Brian Heaston, point source dischargers representative, stated that to him it is clear for this 2-year cycle that being focused on revising existing TMDLs that have WLAs should be the priority. Brian Heaston said that he thinks that WLAs should be the primary driver behind decision making. He also stated that to Andy's point, when coupled with the permit renewal list, it should be clear which TMDLs should move to the top of the list. Brian said that Bozeman, Butte, and Helena should be the priorities. Those WLAs were based on old numeric criteria in department Circular DEQ-12A and that should be a priority, it should be those three TMDLs with those WLAs.

Darrin asked what about Billings? Brian responded that before any new WLA or nutrient standard is applied in new TMDL, he suggests getting revisions done first.

Andy Efta, federal land management agencies representative, said he was not able to touch base with all the federal partners but will do so following this meeting. Andy Efta stated that he appreciates Brian Sugden's clarification and Brian Heaston's comments. DEQ needs to look at nutrients in existing TMDLs rather than direct specific locations to revise. Federal land management agencies are focused on temperature and sediment and would like to see areas with these pollutants revisited concurrently with nutrient assessments being done. Andy Efta mentioned that sediment TMDLs where progressive improvements have been made should be a priority for revisions.

Brian Sugden asked Andy Efta if he was recommending that the focus should be on older sediment and temperature TMDLs because the thinking there has been recovery and there has been action taken? Andy Efta responded that if the TMDL is 15 years old, it is a good chance pollution factors have been eliminated and it is time for re-assessment.

Darrin stated that he highly recommends thinking about those type of comments to drive where DEQ does TMDL Implementation Evaluations (TIEs). DEQ could then go into specific assessment units and monitor where we think there is a potential change, or positive impacts, or if there are other threats in other areas. Instead of going straight to assessment, there is another process within DEQ to kind of screen where we want to go with success stories.

Christina stated that if there is enough time she will talk about TIEs. A few topics could be tabled till next time because this discussion is the focus of the meeting.

Mike Bias, fishing-related business representative, stated that his group appreciates DEQ's work and workload, his group is good with the existing workload and plans. Mike also said that he appreciates looking at nutrients for the Beaverhead watershed and Red Rock watershed and the continued vigilance with the Yellowstone River, especially considering the flooding a couple of years ago. Due to that flooding, he is noticing some changes. Mike also stated that considering last summer's high temperatures and drought conditions, implementation assessments should be a priority for us. For example, the Big Hole River watershed.

Jeff Schmalenberg, state trust land management agencies representative, echoed what Andy Efta said. Jeff stated that looking forward at the current priorities and 2026 Clark Fork River, Gallatin River, and Smith River priorities are good because they are driven by high resource values. Jeff supports looking back at older TMDLs in northwest Montana, focusing on temperature and sediment. He added that looking at the assessment methodologies for the sediment assessment method would be a good idea. A lot is reference comparison, but with change in climate moving forward, he does not know what reference we can look back to. Jeff had no specific areas to recommend focusing on.

Brian Sugden asked Jeff if he saw if Goat Creek has been an area DEQ has sort of put on the backburner for re-assessment. Is that something state lands is viewing as a priority or continued priority? Jeff responded that yes, we did some sampling in 2022, we should review the methodologies that listed Goat Creek as impaired. Jeff said is that a priority compared to the Smith River and Gallatin River, probably not. Brian Sugden stated that he thinks it is an example of a watershed that had TMDLs done many years ago and is worthy of re-assessment for sure.

Darrin stated that DEQ did a partial re-assessment for turbidity and total suspended solids, however the listing and methodology compared to references has been hanging us up. DEQ has to focus on the total suspended solids/turbidity component, and it is really a difficult parameter to monitor for and compare to reference. Darrin stated that it just changes so quickly and is dynamic. It Is still on DEQ's radar but just a different situation that needs more data and it is a lot of work.

Christina showed **Attachment A**, slide 20, the priorities the department has come up with for comparison. She stated that DEQ held a round table a month ago to talk to the other programs at DEQ to see where they think we should be working. Based on their feedback and priority factors, this is the list DEQ came up with. Christina stated that the emerging priorities had been discussed and that the Missouri-Cascade and Belt Creek revisions are necessary because of a new permittee and WLAs will need to be added for the facility.

Christina stated that she wants to take into consideration the STAG's feedback today to add to this list. The Gallatin River is an emerging priority due to the excess algae study on the river. The Clarks Fork of the Yellowstone is an emerging priority because we have new data that we want to use. Lastly, the Clark

Fork River VNRP that was produced in 1998 and is one of first TMDL documents is an emerging priority because it is outdated in terms of WLAs and standards.

Unknown priorities include needed TMDL revisions, such as the Big Hole River and Lower Gallatin River, any new discharge permits that trigger TMDL development, and future monitoring taking into consideration where Darrin's section is monitoring.

Christina then skipped to the close of the meeting stating that if time permits TIEs and §319 applications and projects awarded will be covered in the next meeting. For the next meeting, DEQ will come back with feedback taken into consideration and a proposal for future commitments.

Darrin stated that two future monitoring projects that have been discussed would be Canyon Ferry Tributaries which is currently on pause or Paradise Valley. Those are potential, we need to continue those type of projects to progress through the state and use federal monitoring funds. If you have input on future monitoring projects other than those please chime in.

Brian Sugden asked if those are areas that have not had TMDLs in the past. Darrin responded yes. Darrin said that DEQ has started the Canyon Ferry tributaries effort and don't want a year's worth of data to go stale. The Paradise Valley project is because of local interest in implementing projects and the Yellowstone River has local active groups.

Jordan asked if DEQ envisions any sort of modeling like the Flathead Lake nutrient modeling. Darrin said DEQ is currently working on that. Katie stated that we did complete some modeling efforts on Canyon Ferry Reservoir and are in the modeling report that was wrapped up. Katie Makarowski said that part of the pause has been needing an engaged group of folks that would work with the modeling results and figuring out the next best step to get that information out to the folks to be aware of.

Darrin stated that DEQ is considering more detailed monitoring on Hauser Lake and Holter Lake because they haven't been studied as much, however, it all depends on the resources available.

Christina presented **Attachment A**, slide 33. She notified the group that there will be upcoming STAG solicitation in January 2026. Several of the STAG members have expiring terms coming up. For those with expiring terms, they will be receiving an email from Christina, and they can choose to remain on STAG or step down. If they choose to step down, they will need to notify Christina and provide a recommendation for a replacement. If no replacement is recommended, Christina will send out solicitations to all interest groups for their group.

Christina mentioned that topics not covered today, TIEs and §319 projects and awards, will be covered at the next meeting. In addition, the meeting will cover what waterbodies have been taken out of the impairment category because they were found to have improved. Christina then asked the STAG if there were other topics they would like to hear about.

Jeff said that he would like to hear a summary of public comment on the assessment methods discussed today. Darrin responded that DEQ can summarize that and will also summarize the call for data for the 2026 IR.

Brian Sugden said that he did not have any additional topics but suggested that the next meeting be extended to allow for more time to cover all the topics.

Christina asked the group about the meeting timeframe. She stated that DEQ would need a little time to get new members in place and that she was thinking about March or April. Everyone agreed. Christina said she will send out a Doodle poll to pick the next meeting date, but it will be next year before she sends it out.

Brian Sugden let the group know he is retiring consistent with the end of his January term but is not sure who his replacement will be. He will be in touch with Christina to get his seat filled. Christina mentioned that STAG chair nominations will be an agenda item for next time to fill Brian's position. Christina said that the chair coordinates with her on agenda topics and helps to facilitate meetings.

PUBLIC COMMENT

Vicki Watson, University of Montana Watershed Clinic, asked what happens to the existing TMDLs like those on the tributaries of the Clark Fork River. She specified that the tributaries had limits put on them and asked what numeric standards going away mean for the Clark Fork River if they no longer apply to the tributaries.

Christina Staten responded yes, there are nutrient TMDLs for some of the tributaries to the Clark Fork River that puts them somewhere on the list for revision, whether they are prioritized right away is up for discussion. In terms of what DEQ might prioritize, the VNRP would likely come first because there are several outdated WLAs. Andy Ulven added that those are a nuanced TMDL revision because of the downstream applicable water quality standards.

Vicki Watson asked if there was a particular year in mind for the Volunteer Nutrient Reduction Program revisions? Christina responded not yet.

Ben Catton, Montana Environmental Information Center, asked with the selenium assessments on pause at Lake Koocanusa, when was the last assessment conducted? Why does monitoring pause because of litigation? Can you clarify the role that postponement designation plays in the IR draft? Darrin Kron responded that monitoring continues on Lake Koocanusa through mostly United States Geological Survey (USGS) and other avenues and DEQ coordinates with them quite often, usually monthly, or quarterly. It does not pause any monitoring, just data comparison to the standard that is under litigation. The last time it was assessed was 2014.

Matt Elsaesser, Upper Missouri Waterkeeper, stated that he had concerns that he will get into the public comment for the assessment methods. He then asked about the rational for the Big Hole River where the Big Hole River Foundation submitted 5 years of data.

Darrin responded that DEQ is continuing to coordinate with Save Wild Trout (formerly the Big Hole River Foundation) to get data. DEQ does have an assessment that is under way and DEQ is coordinating with them on the petition to list the Big Hole River. Andy added that DEQ is just waiting on one additional batch of information. Christina added that whether the Big Hole River becomes a TMDL commitment will rest on the assessment outcomes.

Patrick Kelly, Western Watersheds, said that if he is not mistaken, at the last STAG meeting it was stated that the Big Hole TIE was to be released later this year. He asked if that has now been pushed back and if

so, why was this done and what is the new anticipated completion date. Christina responded that the Big Hole TIE is still set to go out for stakeholder comment by the end of the year and will be published on the website sometime next year. DEQ is just working to get everything completed before the end of the year.

Logan McInnis, City of Missoula, asked if Christina could speak more about what the drivers are for making the VNRP an emerging priority. Christina responded that the VNRP came out in 1998 and is very outdated. The WLAs, for example like Deer Lodge has a zero WLA and they discharge, so they need an updated one.

Ben asked if DEQ could clarify the role that a postponement designation plays in the IR draft. Darrin responded that it just means DEQ will complete that in the future.

Christina ended the meeting by saying that attendees can email her if there are questions we didn't get to today. There will also be meeting summary which will be posted to DEQ's website.

Meeting ended at 3:05 p.m.

ATTACHMENT A

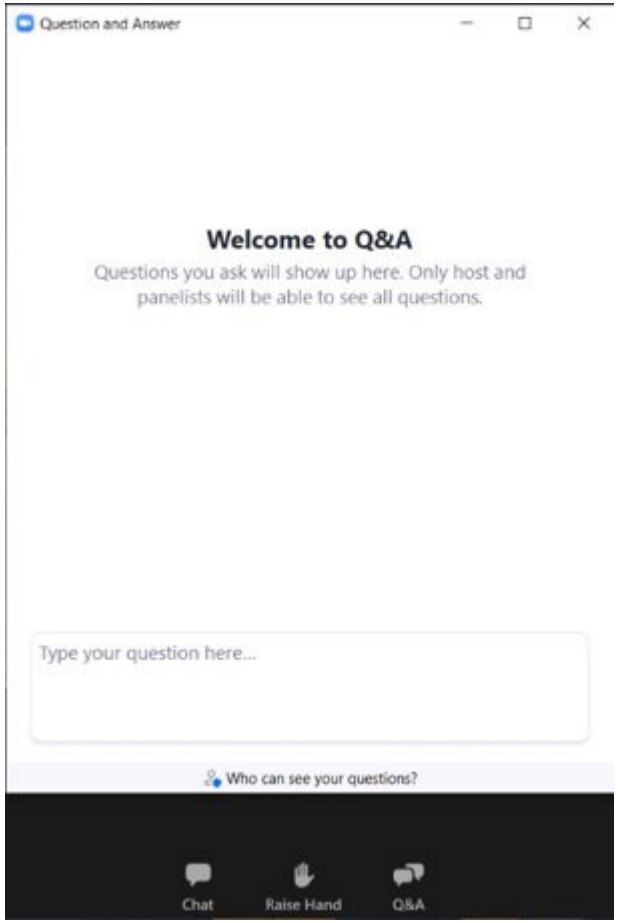
DECEMBER 1, 2025 STAG MEETING PRESENTATION

Statewide TMDL Advisory Group Meeting

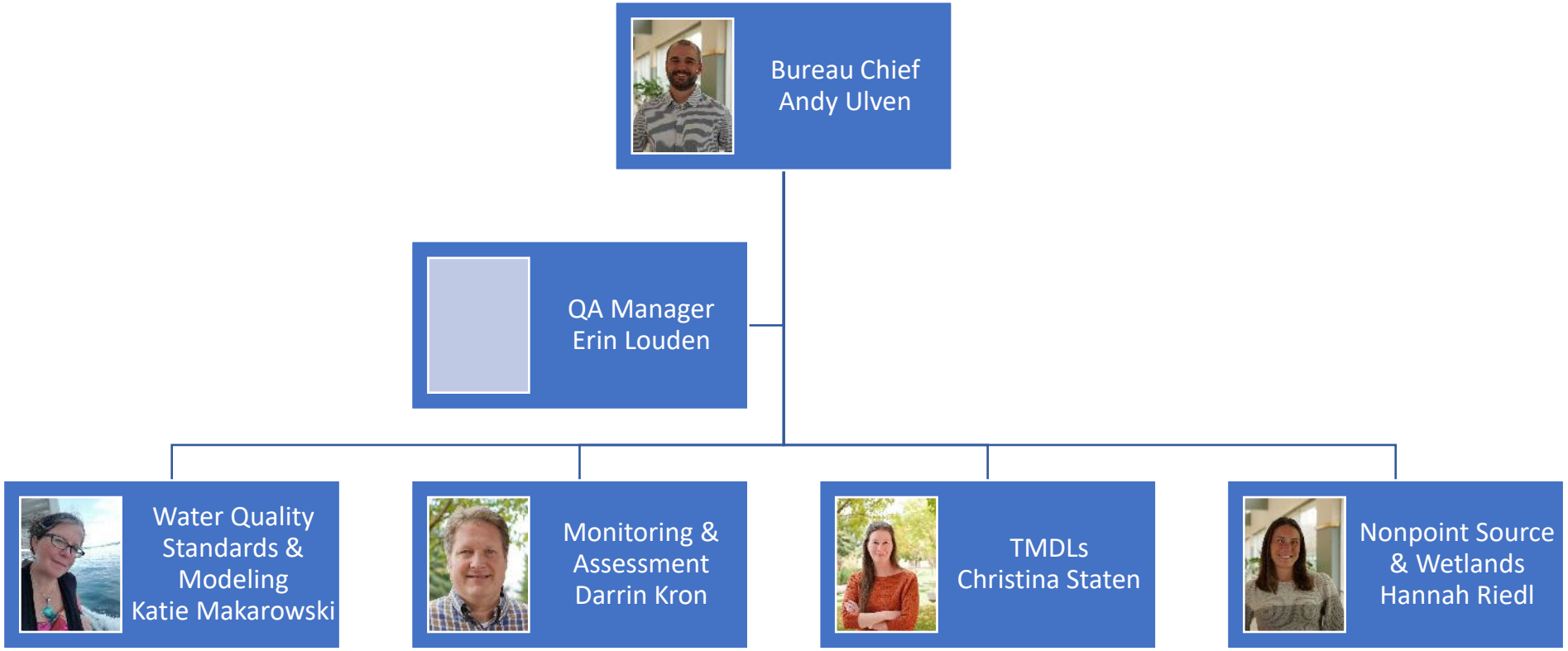
December 1, 2025

Welcome!

- This meeting is a webinar
- STAG members will be panelists
- Members of the public can raise their hand or use the Q&A feature to ask questions during the public comment portion of the meeting
- *9 raises your hand if you're on the phone
- State your name and affiliation before providing your comment



Water Quality Planning Bureau



STAG Member	Affiliation	Representing	Term End Date
Karli Johnson	Montana Farm Bureau	Farming-Oriented Agriculture	January 31, 2026
Ellie Brighton	Montana Stockgrowers Assoc.	Livestock-Oriented Agriculture	January 31, 2026
Frank Szollosi	Montana Wildlife Federation	Conservation or Environmental Interest	January 31, 2026
David Brooks	Montana Trout Unlimited	Water-Based Recreation	January 31, 2026
Brian Sugden	Sugden Forest Environmental, LLC	Forestry Industry	January 31, 2026
Ryan Leland	City of Helena	Municipalities	January 31, 2026
Brian Heaston	City of Bozeman	Point Source Dischargers	January 31, 2026
Greg Bryce (Scott Mason sub)	Hydrometrics	Mining	January 31, 2026
Andy Efta	U.S. Forest Service	Federal Land Management Agencies	January 31, 2027
Jeff Schmalenberg	Dept. Nat. Resources & Conserv.	State Trust Land Mgt. Agencies	January 31, 2026
Vacant		Conservation District Supervisor – East	
Vacant		Conservation District Supervisor – West	
Jordan Tollefson	Northwestern Energy	Hydroelectric Industry	January 31, 2026
Mike Bias	Fishing Outfitters Assoc. of MT	Fishing-Related Business	January 31, 2026

STAG Roll Call

Agenda

- EPA Action on HB664 (return to narrative nutrient standards)
- Review of EPA Commitments Process & Timelines
- Water Quality Monitoring & Assessment Updates (Darrin Kron)
- TMDL Projects & Future Priority Projects (Christina Staten)
- STAG Input on Future Monitoring & TMDL Projects
- 319 Funding Awards & Call for Applications, TIE updates
- Public Comment & Close of Meeting (Brian Sugden / Christina Staten)

EPA Action on House Bill 664

Andy Ulven,
Water Quality Planning
Bureau Chief

TMDL Priority Rankings in the IR

- TMDL Priorities are categorized as High, Medium, or Low in the integrated report (IR)
- These correspond to commitments made to EPA every two years due in September of even-numbered years
- High priority projects will be completed by the EPA commitment date
- Medium priority projects are flexible in that they can become high priorities (EPA commitments) or dropped to low priority for another rising commitment to take its place
- Low priority projects do not have a timeline associated with them

Timelines for EPA Submittals & Commitments

2026

Draft 2026 Integrated Report

(Containing TMDL Priority Rankings)

9/01/2026

TMDL Commitments for 2028

(Next High Priority TMDLs)

9/30/2026

High Priority TMDLs Due

(Beaverhead, Red Rock, Ashley Creek Revision)

Water Quality Monitoring and Assessment Updates and Priorities

Darrin Kron, Monitoring & Assessment Section Supervisor

Assessment Methods Update

- Dissolved Oxygen, Ammonia, Lake Koocanusa/Kootenai R Selenium
  - Public comment period Aug – Oct 2024
  - Dissolved Oxygen
    - Daily and weekly minima standards may be overly stringent.
    - On pause and working with MT DEQ Standards section toward resolution. DEQ did not use for draft 2022/2024 IR.
  - Selenium
    - On pause due to ongoing litigation.
  - Ammonia
    - Addressed public comments with updates to the draft document. Clarity and details were added. Final document is posted on DEQ's webpage.

Assessment Methods Update

- pH
  - Public comment period with 2022/24 IR
  - Implemented within the IR
  - DEQ will address comments and adjust listings if needed
- Nutrients:
  - Wadable Streams, Lakes/Res, Large Rivers
- Temperature
- Fish Tissue
- Metals/Toxics update
- Sediment/Habitat update
- Sulfate update

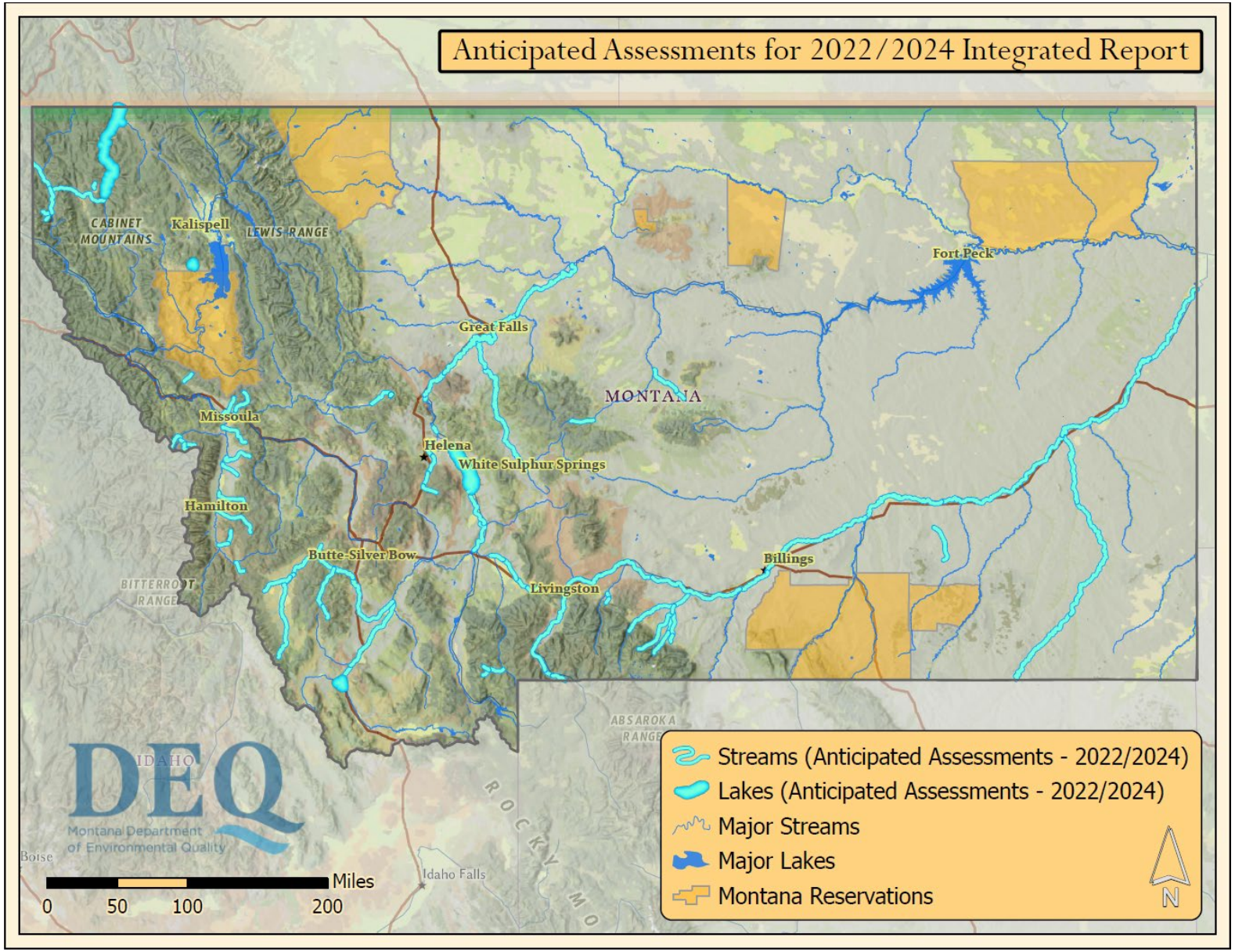
On horizon:
Future IRs

Draft IR Update - 2022/2024

- Public comment through January 13th and call for data for 2026 IR
- Contains assessment of existing assessment methods:
  - Plus, upcoming pH
  - Postponed:
    - Nutrients/eutrophication
    - Dissolved Oxygen
    - Lake Koocanusa/Kootenai R Selenium

Draft 2022/2024 IR Update

- Target available data
- Known external data sources
- DEQ projects
- Volunteer Monitoring
- USGS
- Call for data
  - E. Gallatin
  - Ashley Cr
  - Kootenai River
  - Koocanusa
  - Fairway, Stanley, Lake Cr



Current DEQ Initiated Monitoring and Assessment Projects

Assessment Phase

- Yellowstone River
- Clarks Fork of Yellowstone
- Upper Missouri River
- Deep Creek Sediment
- Smith River

Continued Monitoring (2026)

- Big Hole River Response Variables
- Gallatin River

Monitoring Paused

- Canyon Ferry Tributaries
- Goat Creek Turbidity/TSS

TMDL Projects & Future Priority Projects

Christina Staten, TMDL Section Supervisor

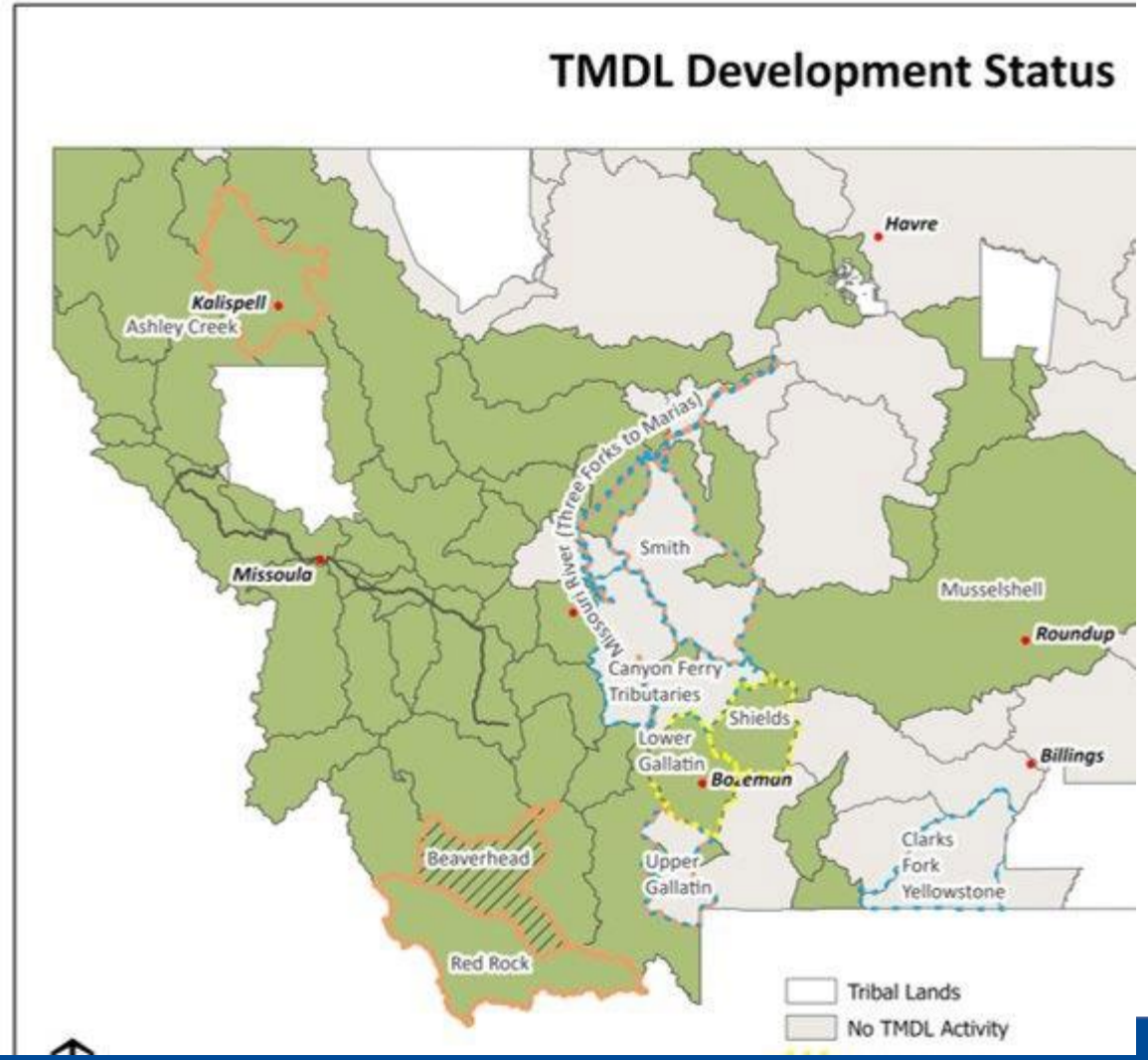
TMDL Commitments to EPA

- Montana must submit TMDL commitments to EPA every two years
- TMDL commitments can be “in development” or “complete”
- “In development” for one 2-year cycle should be “complete” the next 2-year cycle
- TMDL commitments are also reflected in the TMDL priority rankings in the Integrated Report (H, M, L)
  - High: Completion anticipated within 2 years
  - Medium: Completion anticipated within 2 – 6 years
  - Low: TMDL development not started or completion beyond 6 years

Current TMDL Commitments

Due to EPA September 30, 2026

- Beaverhead River watershed nutrients (28 TMDLs) - Complete
- Red Rock River watershed nutrients (30 TMDLs) – Complete
- Ashley Creek nutrient and sediment revisions (8 TMDLs revised within the Flathead-Stillwater document) – In Development



TMDL Prioritization Factors for New Projects (75-5-702, MCA)

- New, individual discharge permit application
- TMDL implementation considerations
- Program coordination
- Resource value
- Potential impact to use (human health and aquatic life)
- Impairment characteristics (severity and magnitude)
- Court determinations
- General waterbody characteristics (size, importance)

STAG Input on Future Monitoring & TMDL Projects

Potential TMDL Priorities

Current Commitments (due 9/30/26)

- Beaverhead Nutrients
- Red Rock Nutrients
- Flathead-Stillwater Revision

Emerging Priorities

- Missouri-Cascade & Belt Revision
- Gallatin River Excess Algae
- Clarks Fork Yellowstone
- Clark Fork River VNRP Revision

Unknowns

- Needed TMDL Revisions
- New Discharge Permits Triggering TMDL Development
- Future Monitoring Projects

Public Comment & Close of Meeting

Close of Meeting

- Upcoming STAG Solicitations for Expiring Terms (January)
- Discussion of Next Meeting Topics & Meeting Date
- Public Comment

Timelines for EPA Submittals & Commitments

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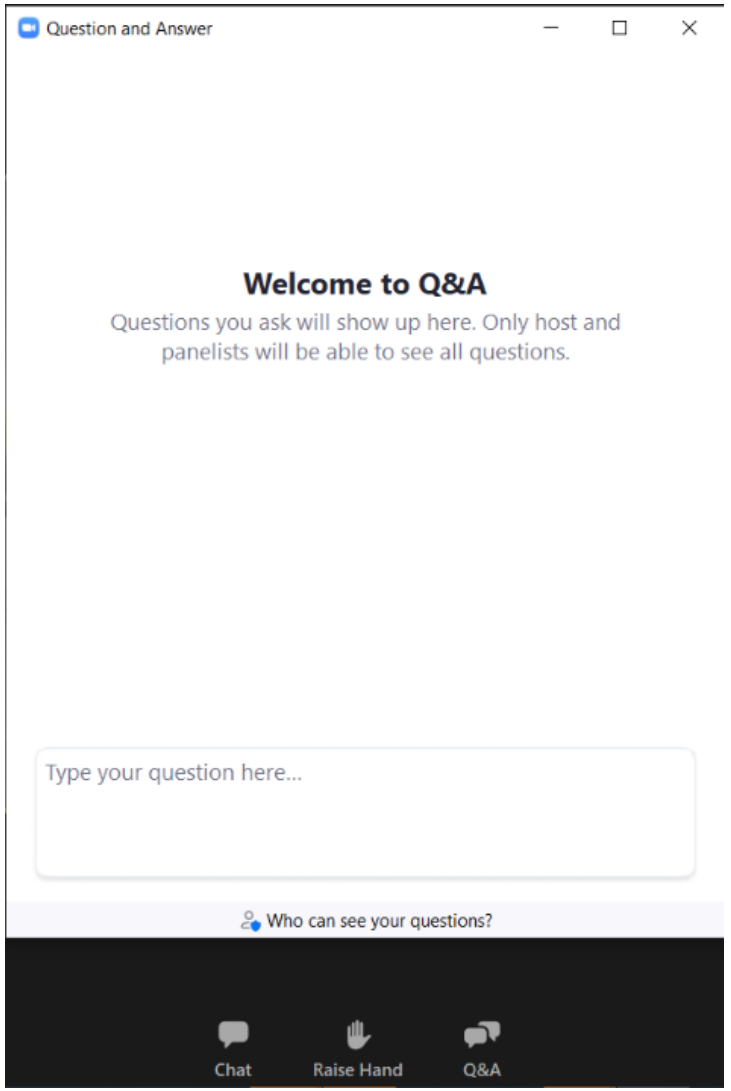
High Priority TMDLs Due

(Beaverhead, Red Rock, Ashley Creek Revision)

Questions / Comments

- Raise hand (*9 if on the phone) or type questions into the Q&A
- DEQ will unmute you if you wish to provide your comment orally
- If calling by phone, press*6 to unmute
- State your name and affiliation before providing your comment



Thanks for Joining Us!

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DEQ STAG Webpage:
https://deq.mt.gov/water/Councils