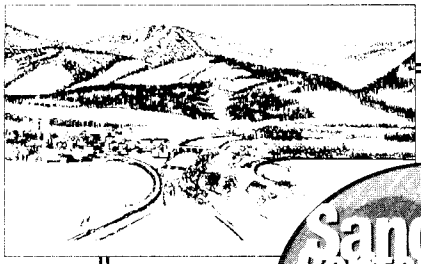
R Steed



City of Sandpoint

CITY HALL
1123 Lake Street • Sandpoint, Idaho 83864

September 13, 2007

Mr. Robert Steed, Surface Water Ecologist
Idaho Department of Environmental Quality
2110 Ironwood Parkway
Coeur d'Alene, ID 83814

Subject: Draft Pend Oreille River TMDL For Temperature

Please accept the following comments on the *Draft Pend Oreille River Total Maximum Daily Load for Temperature* that was presented at the Watershed Advisory Group Meeting on August 16, 2007. I was unable to attend this meeting but did attend the previous WAG meeting where modeling results were first presented. Brett Converse of JUB Engineers, the consultant working on the Sandpoint Wastewater Regionalization study, has provided input to this letter.

From the presentation it was interesting to understand that PO River temperatures are more stable and cooler with the presence and operation of Albeni Falls Dam when compared to natural conditions. This is an important result of the modeling effort.

Of comparable interest was the idea to set a flow allocation for present dischargers to the river at currently permitted flows at an effluent temperature of 20°C. There did not appear to be any consideration given to the maximum daily heat load the river can safely receive from the dischargers. Sandpoint is upgrading its wastewater treatment plant with a $4.5 million improvement project next summer and the next NPDES permit will be for a 5 MGD facility. Additionally, the long term treatment need for Sandpoint is expected to be about 8 MGD and if Sandpoint becomes a regional wastewater treatment facility, the expected flow will be about 10 MGD. The allocated heat load does not appear to give adequate allowance for growth. Setting an allocation based on existing capacity and 20°C does not appear to be based on the findings – that current flows and temperatures from existing wastewater dischargers do not affect overall river temperatures.

It is my understanding that IDEQ will be performing model runs of the river in the near future. The City of Sandpoint requests that these runs determine a total maximum daily heat load the City can discharge into the river without impairment.

The City of Sandpoint appreciates DEQ's work to protect our greatest asset – the abundant and pristine waters of Lake Pend Oreille and the Pend Oreille River.

Sincerely,

Kody Van Dyk, P.E.
Public Works Director