R Steed

Southside Water & Sewer District
Drawer D
Sandpoint, ID 83864
Phone (208)263-1074
*www.southsidewaterand sewe.org*



September 12, 2007

Mr. Robert Steed, Surface Water Ecologist
Idaho Department of Environmental Quality
2110 Ironwood Parkway
Coeur d'Alene, ID 83815

RE: Comments to Draft Pend Oreille River TMDL for Temperature

Dear Mr. Steed:

Please consider the following comments that have emerged from a review of the *Draft Pend Oreille River Total Maximum Daily Load for Temperature* document presented and discussed at the August 16, 2007 Watershed Advisory Group Meeting. Although I was unable to attend, Bruce Vogelsinger of our Board attended in my place. I have also asked our engineer, Paul Klatt of J-U-B ENGINEERS, to provide his input to the document.

We understand that the river actually benefits in overall cooler and more stable temperatures from the operation of the dam at Albeni Falls, as compared to estimated natural conditions. This should be clearly stated up front in the report as a key finding.

On the top of page 68, the report states that, if the water quality standards set by Idaho are not being met under estimated natural conditions, then point source dischargers must limit their effect on the river to no more than 0.3 degrees Celsius. Under this premise, the "Idaho Cross Section" on August 8, 2004 becomes the river reach that governs all other reaches at all other times with a maximum of 22.3 degrees Celsius allowed (refer to the third paragraph of Section 5.5, page 78). Please provide me with copies of the modeling reports referenced as PSU 2006a and PSU 2006b for review with our engineers to further understand this data and approach.

Table 15 on page 71 is confusing and inconsistent. The figures and tables referenced do not appear to correspond to the river reaches listed. The Washington state line is also discussed as a critical compliance point but is not listed. It would also be helpful to include a results column and date of those results for the reader.

The TMDL report states on page 79 that current flows and temperatures from the existing wastewater treatment plants do not have significant effects on river temperatures. The report then goes on to assign very specific monthly temperature criteria to each plant and recommends limiting all future heat loads to no more than 7% larger than the loads assumed for today's conditions. It is very unclear that the temperatures assigned have any basis in current operating conditions for these point sources. These biological systems receive, treat and discharge the wastewater while adding virtually no heat in their processes. The NPDES permit limits listed on Table 20 do not exist in current permits. They likely do not exist in the permits because every plant would violate them several months out of each year. The temperature limits proposed in Table 22 go even further toward the absurd by listing unachievable values in every month of the year. Combined with only 7% growth allowed, effluent cooling would be mandated for these plants within a few years.

Controlling for temperature in wastewater treatment plants would be extremely difficult, utilize vast amounts of energy, and be extremely expensive; probably tens of millions of dollars just to get started. The justification for placing those temperature restrictions and extreme burdens on the public appears to be based on something that has no significant impact. This is simply unreasonable and unacceptable.

It is crucial that this study determine the heat loads from point sources that would actually create a change in river temperature in order to assign realistic allocations that will not adversely affect the river. The currently unachievable heat load restrictions in the report will produce no benefit to the river system but will eliminate growth for existing systems and communities. At the very least, the study must include all currently anticipated build-out flows being considered under the regional study being developed at this time. Those can be obtained from Brett Converse at J-U-B ENGINEERS, Inc. or Kody Van Dyk at the City of Sandpoint.

While Southside Water and Sewer District does not currently discharge into the river, we are contemplating such a discharge as part of our planning to meet demands within our boundaries. Whether we do that alone or as part of a larger regional entity, the discharge still enters the waterway and must have a realistic loading associated with it. Our discharge would be similar to Sandpoint, Dover and Priest River in quality with a current peak day flow estimate of 0.24 million gallons per day.

Please incorporate our comments into you planned revisions of this planning documents and call with any questions you may have.

Sincerely,

Gary Wescott, Chairman