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STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

Department of Ecology
Water Quality Program
DEC 20 2004

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Dirk Kempthorne, Governor
Toni Hardesty, Director

December 17, 2004

Mr. Ken Koch
Water Quality Program
WA Department of Ecology
P.O. Box 47600
Olympia, WA 98504

Dear Mr. Koch:

Thank you for providing the Idaho Department of Environmental Quality the opportunity to comment on the Department of Ecology's Integrated Report and Clean Water Act Section 303(d) listings. Please consider our comments as additional clarification on the information provided in the report as it relates to our shared interstate waters.

The Idaho Department of Environmental Quality would like to provide additional information to the Department of Ecology to ensure users of the report have an understanding of existing water quality conditions and current improvement activities in Idaho. We are concerned that without this understanding and knowledge, unwarranted management actions may be suggested or expected in Idaho.

We believe it is important to inform report users that Washington and Idaho have different water quality standards and different water quality conditions in each state. Report users should be informed that exceeding Washington State standards on shared interstate waters may be due to natural conditions. We believe inclusion of this information in the report will minimize downstream concerns and expectations for Idaho to mitigate naturally occurring conditions.

EPA approved Idaho's 1998 303d list. Idaho is still operating under this list at this time. On June 5, 2004 we submitted a 2002-03, Integrated 305b/303d Report to EPA. To date EPA has not acted on this report. We are currently developing our 2004 Integrated Report, and our comments reflect the transitional nature of Idaho's listing process and should be taken as such.

The report shows water quality standard exceedances for pH on the Snake River (from station 219-220). Washington's water quality standards allow pH to range from 6 to 8.5. However, Idaho water quality standards allow pH to range from 6 to 9. We would like to point out that tributaries to the Snake River (Tammany Creek and Lindsay Creek) and water from a recently constructed 400 foot domestic well, show consistent pH measurements ranging up to 8.7. If such waters in Idaho are a source of elevated pH in shared waters with Washington, there is little opportunity for reconciliation since these conditions appear to be natural.

The report lists Paradise Creek in Whitman County near the Washington and Idaho State border as exceeding water quality standards for pH, dissolved oxygen, and ammonia. We believe it is important to inform the report user that Idaho has an approved TMDL for dissolved oxygen and ammonia on Paradise Creek and additional mitigation may not be warranted at this time.

A similar situation occurs on the Palouse River near the Washington and Idaho State border. The Palouse River is listed in section 5 of the report for exceedance of Washington's fecal coliform standard. Report users should be informed that Idaho has an e-coli bacteria standard and monitoring for the recently completed Palouse River Tributaries TMDL showed no exceedances of e-coli bacteria at the Washington State line.

In the Panhandle region of Idaho, the Pend Oreille River is listed as impaired for sediment, temperature, and total dissolved gas. Under the current TMDL planning process due for completion in 2007, Idaho DEQ is evaluating current and historic information regarding the appropriateness of the impaired listing.

The Spokane River is currently listed in Idaho as impaired for metals and temperature. A metals TMDL for the Spokane River and Coeur d'Alene Basin was jointly issued by DEQ and EPA. This TMDL was later declared null and void by an Idaho District Court decision. While the proposed list for Washington includes impairment for dissolved oxygen, the Idaho reach meets a federally approved standard of 6.0mg/l for cold water aquatic life.

Hangman Creek is listed in Idaho as impaired for sediment, temperature, and nutrients. A combined effort by the Coeur d'Alene Tribe, DEQ, and EPA to develop a TMDL for Hangman Creek in Idaho is scheduled for 2005.

The comments provided above suggest there may be a need for better coordination between our states as we develop water quality reports on shared interstate waters. We encourage your input and look forward to future discussions regarding these shared interstate waters. We thank you for the opportunity to comment on the proposed list.

Sincerely,

Michael McIntyre for

Barry N. Burnell
Administrator
Water Quality Division

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c: Michael McIntyre