



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

2110 Ironwood Parkway, Coeur d'Alene, ID 83814 (208) 769-1422

C. L. "Butch" Otter, Governor  
Toni Hardesty, Director

November 18, 2010

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Ms. Karen Baldwin  
Water Quality Program  
WA State Department of Ecology  
4601 N Monroe  
Spokane, WA 99205

DEPARTMENT OF ECOLOGY  
EASTERN REGIONAL OFFICE

Subject: Comments and Concerns Regarding Draft Pend Oreille Temperature Water Quality Improvement Report

Dear Ms. Baldwin:

Thank you for the opportunity to review and provide comments on concerns with the Draft Pend Oreille Temperature Water Quality Improvement Report. We congratulate you on the significance of this accomplishment. We request that you consider our comments and concerns with the Idaho load allocation section.

The draft TMDL provides a load allocation to the State of Idaho. Washington, however, has no authority to provide allocations to sources in Idaho. Please remove the reference to an allocation to sources in Idaho.

In addition, the load allocation at the Idaho—Washington border as described on page 73 of the Draft Pend Oreille Temperature Water Quality Improvement Report is for the maintenance of existing condition temperatures as observed in 2004. Idaho cannot be accountable for climatic or other nonhuman-induced conditions that could increase water temperatures within the Pend Oreille River above temperatures observed in 2004. Such conditions are beyond the control of sources in Idaho.

Additionally, Idaho CE-QUAL-W2 modeling results evaluating the effect of NPDES-permitted facilities on temperatures in the Pend Oreille River are consistent with those reported on pages 59 and 67 of the Draft Pend Oreille Temperature Water Quality Improvement Report. Both results indicate that NPDES-permitted discharges have no measurable influence on existing maximum temperatures observed in the Pend Oreille River. As such, temperature limits on Idaho discharges are not required in order to meet Washington WQS. The TMDL should reflect this fact.

If you have any questions or need any additional information, please feel free to contact Kristin Keith, Robert Steed or me at (208) 769-1422.

Sincerely,

A handwritten signature in black ink that reads "Thomas Herron".

Thomas Herron  
Water Quality Manager

kk/rs/fb