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DEPARTMENT OF ECOLOGY
EASTERN REGIONAL OFFICE

November 11, 2010

Karin Baldwin
4601 N Monroe
Spokane, WA 99205

Re: DRAFT Pend Oreille River Temperature Total Maximum Daily Load Water Quality Improvement Report dated October 2010, Publication No. 10-10-065

Dear Ms. Baldwin:

Ponderay Newsprint Company (PNC) is pleased with the overall results of the draft TMDL and the Implementation Strategy. The report confirms the cooling benefit to the Pend Oreille River resulting from the Albeni Falls dam that PNC had described in comments to Ecology on the 303(d) listing back in 2002. PNC does have a few comments for Ecology to consider.

1. Page xi. The paragraph describing the water source states:

"At Newport, the most upstream reach in Washington and situated below Albeni Falls dam, river temperatures are cooler now than what is predicted to have occurred naturally. This is due to withdrawal of colder subsurface water within Albeni Falls forebay which is discharged downsteam following power generation."

The statement is correct in that the temperature is cooler than the natural condition, but the explanation is incorrect. Albeni Falls dam is placed far down the outlet stream from Lake Pend Oreille. Unlike Box Canyon and Boundary dams, the Albeni Falls dam did not create the lake. Being far down the outlet stream, the water passing through the dam is not selectively drawn from colder subsurface water within the forebay. All the water moving down the outlet stream passes through the dam. The cooling effect comes from the fact that the dam maintains the level of the lake at a higher level than the natural level that occurred in the late summer when flows are reduced. Because the lake is at a higher level the surface waters of the lake drawn into the outlet stream include waters from 11 feet more of the water column of the lake than in the natural late summer condition. The dam has no ability to selectively draw cooler waters from behind it to discharge. PNC suggests the following change:

"At Newport, the most upstream reach in Washington and situated below Albeni Falls dam, river temperatures are cooler now than what is predicted to have occurred naturally. This is due to the dam maintaining the lake level in the mid and late summer higher than what the natural level would have been at times of low stream flow, such that the surface water drawn to the outlet of the lake comes from a greater depth range than under the natural condition." ~~withdrawal of colder subsurface water within Albeni Falls forebay which is discharged downsteam following power generation.~~"

2. Page 75. PNC agrees with the modeling showing that the NPDES permitted point sources (including PNC) have "no definable influence on existing temperatures." Setting a limit based on the present effluent temperature limit and maximum flow makes sense. The method for translating such information to a kilocalories per day limit appears reasonable. PNC notes that the flow used for PNC was 0.228 m3/sec (or 5.20 mgd) and asks the basis for using 5.20 mgd. PNC's current permit does not have a flow limit, and the fact sheet for PNC's current permit shows a maximum flow of 5.7 mgd between January 2003 and July 2006. (Fact Sheet, table 1 pg 5.) PNC requests that the kilocalories per day limit be recalculated based on the present effluent temperature limit of 90^0F and a flow of 5.7 mgd.

3. Skookum Reach appears to be anomalous.

In many different places throughout the TMDL report the Skookum Reach appears anomalous. Somehow in the modeling it is presented as having a very substantial heat increase in a short distance compared to the upstream Dalkena Reach, and then loses that substantial increase by the time it reaches the next downstream Kalispel Reach. The upstream and downstream reaches both show that the existing conditions are cooler than the natural, yet in Skookum Reach it shows that the natural conditions are cooler than the existing. PNC believes that this oddity does not make sense. An explanation for how this could be true would help. If it results from some error either in programming or in data, then the problem should be corrected and new figures and tables prepared. If no explanation is possible, then there should be an admission that it doesn't make sense, that Skookum Reach probably really does meet the temperature criteria, and that the glitch does not seem to affect the rest of the downstream presentations.

Thank you for the opportunity to comment on the draft TMDL.

Sincerely,

Scott K. Campbell
ESH Manager
Ponderay Newsprint Company