

1. Where do you live or what community do you identify with the most?

		Response Percent	Response Count
Northern Idaho over the Rathdrum Prairie Aquifer		60.0%	3
Idaho, but not over the Rathdrum Prairie Aquifer		40.0%	2
Eastern Washington, over the Spokane Valley Aquifer		0.0%	0
Washington, not over the Spokane Valley Aquifer		0.0%	0
Outside the region		0.0%	0
I don't know		0.0%	0
answered question			5
skipped question			0

2. What are your primary interests and concerns regarding the Rathdrum Prairie Aquifer?

	Response Count
	4
answered question	4
skipped question	1

3. Are the proposed actions for each of the objectives or sections adequate? If not, what would you suggest?

		Response Percent	Response Count
Objective 1: Meet Future Demand for Water		66.7%	2
Objective 2: Prevent and Resolve Water Conflicts		100.0%	3
Objective 3: Protect the Aquifer Water Quality		100.0%	3
Implementation		100.0%	3
Adaptive Management		100.0%	3
answered question			3
skipped question			2

4. Overall impression

	Completely agree with the plan	Agree with most of the plan	Disagree with some parts of the plan	Disagree with most of the plan	Rating Average	Response Count
How much do you agree with the overall CAMP plan?	0.0% (0)	60.0% (3)	20.0% (1)	20.0% (1)	2.60	5
What parts would you change to make it a better document?						4
answered question						5
skipped question						0

5. What else would you like the Advisory Committee to know as they prepare to deliver a recommended plan to the Idaho Water Resource Board?

	Response Count
	3
answered question	3
skipped question	2

2. What are your primary interests and concerns regarding the Rathdrum Prairie

	Response Text	
1	Issue of new water rights. They are difficult to obtain, and will continue to be used by those who want no growth as a means of stopping development.	Oct 26, 2010 8:09 PM
2	<p>1. Likely or potential pollution from BNSF refueling station into the aquifer has not been addressed. See Montana.</p> <p>2. Allowing the Rathdrum Power Plant to extract water from the aquifer. Go nuclear instead.</p> <p>3. Residential and farming were here first, don't restrict our use of water.</p> <p>4. Keep medium and high density residents in or close to city limits. allow only low density in rural areas.</p> <p>5. Keep and enforce policies for good clean potable water in the aquifer.</p> <p>6. Don't allow development to outstrip future aquifer source.</p> <p>7. Do not allow Spokane to outstrip Idaho's needs.</p>	Nov 18, 2010 6:48 PM
3	That the long-term impact of climate change on the Rathdrum Prairie Aquifer is adequately addressed in the CAMP final report.	Dec 1, 2010 6:32 PM
4	Water Quality and Quantity	Dec 2, 2010 3:48 PM

3. Are the proposed actions for each of the objectives or sections adequate? If

Objective 1: Meet Future Demand for Water		
1		Oct 26, 2010 8:09 PM
2	See my .comments in 2 above	Nov 18, 2010 6:48 PM
3	No map of buildout of possible impacts.	Dec 2, 2010 4:09 PM

3. Are the proposed actions for each of the objectives or sections adequate? If

Objective 2: Prevent and Resolve Water Conflicts

1	Idaho/Wa. joint committee to resolve differences.	Oct 26, 2010 8:09 PM
2	See my .comments in 2 above	Nov 18, 2010 6:48 PM
3	No. The Ad Hoc Committee is insufficient.	Dec 2, 2010 4:09 PM

3. Are the proposed actions for each of the objectives or sections adequate? If

Objective 3: Protect the Aquifer Water Quality

1	Largely based on wastewater volumes. Additional mean and methods of wastewater treatment will allow for future development. Moving point source dischargers out the Spokane River and into a filter/ground water injection technology will relieve pressure on the Spokane River water quality, which will also increase aquifer water quality.	Oct 26, 2010 8:09 PM
2	See my .comments in 2 above	Nov 18, 2010 6:48 PM
3	No. Need land use component.	Dec 2, 2010 4:09 PM

3. Are the proposed actions for each of the objectives or sections adequate? If

Implementation

1	Formation of an implementation committee to take the recommendations of the CAMP to the next level.	Oct 26, 2010 8:09 PM
2	See my .comments in 2 above	Nov 18, 2010 6:48 PM
3	No. Need to spell out authorities.	Dec 2, 2010 4:09 PM

3. Are the proposed actions for each of the objectives or sections adequate? If

Adaptive Management

1	This is largely technology driven. Using the best management practices for storm water, wastewater, and surface water protection will ensure the long term stability of the aquifer. Adapt to new technologies as they evolve. Be progressive. Management of the resource is on going, not staganet.	Oct 26, 2010 8:09 PM
2	See my .comments in 2 above	Nov 18, 2010 6:48 PM
3	Yes, if right players continue.	Dec 2, 2010 4:09 PM

4. Overall impression

What parts would you change to make it a better document?

1	See my .comments in 2 above	Nov 18, 2010 6:48 PM
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4. Overall impression

What parts would you change to make it a better document?

- | | | |
|---|---|---------------------|
| 2 | The description of climate variability has no numbers whatsoever, not even a range of projected temperature and precipitation increases, although Dr. Sridhar's report quotes "an increased precipitation (4-5%) and temperature (0.31-0.45 degree C./decade)", which is approximately .5 - .7 degrees F. temperature increase. Not only is that not quoted in the draft report but a necessary perspective is missing; it took some 100 years for worldwide temperatures to increase 1 degree F. -- the rate of projected warming in the 21st century will be five times faster than that. It took Dr. Sridhar took ten months to conduct his study and your description of climate variability neither quotes from or uses anything from the study; it appears to be a whitewash of the entire issue. The draft of the CAMP Advisory Committee report is replete with may's and could's; the strongest language is "likely." In an interview with a Coeur d'Alene Press reporter published on July 18th, Dr. Sridhar said: "There are no questions about these changes. It's going to happen." Your mention of climate variability has none of that certainty in it. Please include at least a few numbers, related to items such as increased irrigation requirement, increases in evapotranspiration, earlier runoff and more winter precipitation falling as rain. | Dec 1, 2010 6:32 PM |
| 3 | More emphasis on quality rather than quantity. Drilled holes in the aquifer do not reflect the true volume of the aquifer. A resistivity survey would delineate the basement contours. | Dec 2, 2010 3:48 PM |
| 4 | Good goals. Address local government roles and differences in Idaho and Washington. Regimes - what is working and what is not? Need more analysis on conflicting uses (land use, growth patterns, location of wells versus private versus municipal systems.) | Dec 2, 2010 4:09 PM |

5. What else would you like the Advisory Committee to know as they prepare to

Response Text

- | | | |
|---|--|----------------------|
| 1 | See my .comments in 2 above | Nov 18, 2010 6:48 PM |
| 2 | I attended all but the final one or two Advisory Committee meetings, as a resource person. I enjoyed participating in the process and was impressed with the quality of the people on the Committee and the support staff. I want this document to fully represent the depth of work done by the Committee and the staff, including Dr. Sridhar's 10 month investment in his study.

Bill Irving, president of the Coeur d'Alene branch of the Climate Change Action Network | Dec 1, 2010 6:32 PM |
| 3 | Hayden Lake is fast becoming a very polluted body of water. Plant growth, boats, etc. There is a need to get on Bureau of Lands regarding boat dock permits. | Dec 2, 2010 3:48 PM |



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

December 2, 2010

Sandra Beer Thiel
Water Resource Planner
Idaho Department of Water Resources
322 East Front Street
Boise, Idaho 83720-0098

Subject: Comments on the draft Rathdrum Prairie Comprehensive Aquifer Management Plan

Dear Ms. Thiel,

We have reviewed the draft Rathdrum Prairie Comprehensive Aquifer Management Plan (CAMP) and offer the following comments.

The CAMP identifies in its vision statement the need to "preserve the exceptional quality and reliability of the Rathdrum Prairie Aquifer." The plan goes on to identify three main objectives which include: #1 – Meet Future Demand for Water; #2 – Prevent and Resolve Water Conflicts; and #3 - Protect the Aquifer. The Idaho Department of Environmental Quality (DEQ) supports these goals that identify the unique quality of the Rathdrum Prairie Aquifer and the objective to preserve and maintain the high quality of water that currently exists in the Rathdrum Prairie Aquifer. As identified later in the document, projected increases in population growth over the RPA will likely continue and with that growth, the demand for high quality drinking water and the continued protection of that resource will persist.

On page 9, first paragraph, the following sentence, "The SVRPA is the sole source of drinking water for the residents living over the aquifer" should be revised to address residents living adjacent to but not directly over the aquifer. There is an ever-growing population that is not directly over the aquifer but receive water from the aquifer.

On page 9, first paragraph, the term beneficial use is used to describe the vulnerability of water quality in the aquifer. Beneficial uses were well established when the US EPA designated the Rathdrum Prairie Aquifer as a sole source aquifer and later when the State of Idaho further designated the RPA as a sensitive resource aquifer. The management of activities over the RPA sensitive resource aquifer is defined by a standard to maintain or improve existing water quality through the use of best management practices and best available methods and provide for a greater level of water quality protection than the current beneficial use categorization used in the draft document. Clarification of the sensitive resource aquifer designation as a regulatory rule defining ground water quality will help local communities and residents better understand the level of protection that is needed to maintain the high quality water in the Rathdrum Prairie Aquifer.

On page 12, the first paragraph is a duplication of the last paragraph on the preceding page.

On page 19, third paragraph – “The director of IDWR should redefine the RPA boundaries in the GWMA so that they are consistent with the Idaho boundaries in the bi-state USGS study...” Currently, DEQ and PHD use the 1978 USGS aquifer boundaries for regulatory purposes. Creating a different aquifer boundary for the GWMA may generate more confusion between the various regulatory agencies. This would conflict with the goal of improving agency efficiency in managing the RPA as identified in Action Item #2 under Objective #3. The RPA boundaries defined in the bi-state USGS study are the numerical model boundaries and do not reflect the actual aquifer boundaries. This issue was identified in several of the USGS reports that were produced for the bi-state study and some examples are provided below:

“In revising the aquifer boundary, Kahle and others (2005, page 17) noted that,

For modeling purposes it may be more important to use a more inclusive aquifer boundary to better represent contributions from adjacent surficial deposits that are in hydraulic contact with the Sole Source Aquifer.

The model extent is not intended to be a redefinition of the aquifer.” (USGS SIR 2007-5044, page 6)

In our opinion, redefining the actual aquifer boundary to the model boundaries would appear to add complexity and confusion to the regulated community and would not promote cohesive management of the aquifer.

On page 19, under the Objective #3 is the first action item, “Assess all CAMP activities to ensure projects implemented through CAMP protect aquifer water quality.” The document is silent on which agency or entity is responsible to assess all CAMP activities.

On page 30, Appendix C, Item #18: “Future water demand may, however, be limited by the ability to discharge treated municipal effluent.” It may help clarify this statement by adding at the end of the sentence, “to the Spokane River or the RPA.”

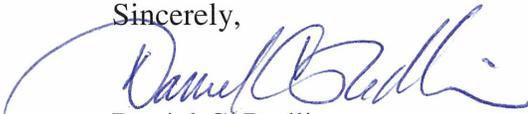
On page 38, Appendix 7 provides the full description of the strategies that the Aquifer Protection District should support for the purposes of protecting the aquifer quality (objective #3). DEQ is encouraged by the comprehensive list of strategies that are included in Appendix 7, many of which directly involve DEQ. However, the current draft document does not provide any details, either in the body of the document or the appendices, on the current role and responsibilities of the Kootenai County Aquifer Protection District as defined by either state or county statute. The draft document identifies increased responsibilities for the Aquifer Protection District; and therefore, a more thorough description of the Aquifer Protection District may help the reader better understand how the APD will carry out the strategies identified in Appendix 7. Providing this clarification may also help with implementing Action Item #2 on Page 19 that encourages the Aquifer Protection District to “work with Panhandle Health District, Idaho Department of Environmental Quality, tribal governments and others to address overlapping jurisdictions with the goal of improving efficiency.”

Ms. Thiel
December 2, 2010
Page 3

On Page 39, Appendix 7, Strategy #5 identifies a number of tasks associated with metal contamination of Lake Coeur d'Alene. Many of these tasks are redundant with the goals and objectives of the new Coeur d'Alene Lake Management Plan implemented by the Coeur d'Alene Tribe and DEQ. We suggest replacing some of these tasks with recognition of the Coeur d'Alene Lake Management Plan and a strategy of increased coordination and support of the Lake Management Plan.

Thank you for the opportunity to provide comment on the draft CAMP for the Rathdrum Prairie Aquifer. Please let me know if you have any questions regarding our comments. We look forward to a successful completion of the CAMP and to working with all the agencies and organizations in the future to implement the CAMP to preserve and protect the water quality in the Rathdrum Prairie Aquifer.

Sincerely,

A handwritten signature in blue ink, appearing to read "Daniel C. Redline". The signature is fluid and cursive, with a large initial "D" and "C".

Daniel C. Redline
Regional Administrator

Cc: Barry Burnell, Water Quality Administrator, DEQ
Daisy Patterson, CAMP consultant

From: Carolyn Liesy [<mailto:cliesy@cox.net>]
Sent: Saturday, November 20, 2010 1:06 PM
To: IDWRInfo
Subject:

Dear Sirs:

Regarding your December 9 Meeting for Input on the Spokane Valley/Rathdrum Prairie Aquifer.

As a fifty year resident/owner of a home on Twin Beaches on Lake Coeur d'Alene I am concerned about the development in the the area and the demands on the aquifer. If the growth rate of homes over the aquifer is over 2% then I fear contamination of water to those homes down stream. I think development should be limited to existing cities that have systems to handle waste and the rural character of the area needs to be retained. Lot sizes need to be at least 5 acres per residential unit. I am totally against a lot of development with small lots and only septic tanks to handle the waste. Too much development will ruin the water supply.

Thank you for your consideration. I would like to be at the meeting but I live out of town.

Carolyn Liesy
3 Porcupine Lane, Twin Beaches, ID

Recommendations

Carolyn Liesy

Thank you for this opportunity to comment on the draft CAMP.

Suggested language for second bullet under Objective #2: Prevent and Resolve Conflicts:
“IDWR will develop criteria to protect source water quantity in the event that augmentation projects are proposed. Augmentation projects are defined as those which would take water from one source to unnaturally augment another.”

Current Language:

IDWR should develop criteria for future water augmentation projects in Idaho whose objective is to enhance the hydrologic system.

The current language is insufficient in that it:

1. Technically would not offer protection from augmentation proposals if they come from outside of Idaho
2. Would not actually seek to protect Idaho water sources, and only states “should develop criteria” without any reference to protection
3. Does not ensure the action will be taken. The word “should” needs to be replaced by “will” to ensure it happens (similarly strong language is used in the first bullet under Objective #2)
4. Does not specify what “the hydrologic system” is which would be enhanced. The one the water is to be taken from? The one it is going to?
5. Does not address augmentation projects that may be for a different purpose than enhancement
6. Improperly uses the word “whose”

Thank you for your consideration.

Sincerely,

Jennifer Ekstrom
Executive Director
Lake Pend Oreille Waterkeeper

Hello,

Please accept my following comments on the Rathdrum Prairie CAMP Draft. I have come late to this process, so I apologize in advance if my comments have previously been discussed or addressed, or if they do not fall under the intent of the CAMP effort. I also realize that some of the following comments may be topics that are discussed elsewhere in IDWR policy or documents, and if this is the case, it would be helpful to have mention made of them in the CAMP with references provided to the other relevant material.

- The draft discusses how the SVRPA model was used to quantify consumptive use growth on Spokane River flows. This is an excellent water management and planning tool, but I do not see any discussion in the CAMP of how the model will, or could, be used in local or regional water resource planning or decision making.
- Why was the mid-range growth projection for consumptive use the only scenario that was modeled for river flow impacts? It would be useful for decision makers, as well as for wider community discussions, to know what the potential impacts to the river flows are if growth or consumptive use is greater than the mid-range projection, and how this would affect water management in the area.
- I was pleased to see that climate variability/uncertainty were taken into account in the planning projections. It would be nice to also see a mention made of the growing concerns, nationally and internationally, about limited water resources and limited access to high-quality water used in industry. Growing water shortages make it possible that our region could see an influx of water "refugees," including industries that are looking to relocate to areas with a greater abundance of high quality, inexpensive water. What are the criteria that would or should be used by decision makers when faced with applications for large withdrawals? How could unusually high growth rates or withdrawal requests be managed region-wide?
- During times of limited water supply in the region, or higher than anticipated growth, what is the recommended procedure to evaluate new withdrawal requests?
- What are priorities for water use that affect decision making (priorities either by law, regional values, or precedents)?
- Consideration should be given to creation of a drought plan in the region, whether on the Rathdrum Prairie side alone, or across the entire SVRPA area. The plan could conceivably discuss: what the acceptable or legally allowed impacts to the river are, how the region would collaborate in such a situation, what the steps are that would be taken in such a situation, what the key indicators are that would trigger actions or discussions, how the Spokane River water quality would be affected by wastewater discharges during lower flows and what impacts this could have on the region's different systems, etc.

I am pleased with the consideration given to the many different factors in the discussion of aquifer management and I thank you for providing the opportunity to comment on the plan.
Sincerely,

Katherine Rowden
Service Hydrologist
National Weather Service / NOAA
Katherine.Rowden@noaa.gov