

Black Lake Watershed Advisory Group
Draft Black Lake Nutrient TMDL Comments
11/5/09

1. Population/septic data is out of date. The number of homes/septic tanks around the lake has increased since the TMDL was written.
 - a. Action: The data will be updated and loads calculated for the current population around the lake. It was mentioned Scott Fields gave Ken Olsen some maps to work on this. **Reran numbers, but couldn't update model. Old numbers are 2X load as new numbers, so old approach is more conservative. Need to acknowledge there is a significant data gap here and a survey is necessary to get a better idea as to what is happening with septic influence on Black Lake**
2. The TMDL was based on a period of record that was reflective of drought years, not average flow conditions.
 - a. Action: This will be stated in the qualifier statement (see #10).
3. The TMDL uses the term "Irrigation District" to describe the floodplain property east and west of the lake. There is no legal record that this is an irrigation district.
 - a. Action: This term will be replaced with a more appropriate term and it will be stated that there is a direct discharge into the lake, which is an exemption under the Clean Water Act.
4. Estimates of the Coeur d'Alene River flow/nutrient input into Black Lake may be high.
 - a. Action: DEQ will validate regression estimates using lake elevation data from Cataldo vs. Tubbs Hill (or a closer site) data for 2005-2006. Add this information to the qualifier statement (see #10).
5. There are significant data gaps with respect to flow and TP inputs from the irrigation pumps into Black Lake.
 - a. Action: It will be written into the TMDL that at the time of drafting the document, DEQ was unable to obtain actual flow and TP data from the landowner; however, negotiations for actual monitoring data collection continue to be pursued.
6. An incomplete data set was used from the irrigation pumps and lake monitoring stations.
 - a. Action: Bob Martinson will provide in writing a description of data inconsistencies and will attach WQ monitoring results in the form of lab reports (if he has them). **Bob called and said there are no inconsistencies**
7. There is confusion as to how the load estimates from the irrigation pumps were calculated.
 - a. Action: DEQ will review the Kann & Falter report and see how they calculated TP loads and compare these to values reported in the TMDL.
8. "Shall" and "Should" in Beneficial Use section of the TMDL do not pertain to a watershed with no point sources – this is confusing.
 - a. Action: DEQ will copy language used for this section in the Hangman Creek TMDL and send it to the WAG for approval. **I looked in the**

Hangman Creek TMDL and I don't see anything different with respect to "Shalls and Shoulds"

9. The two loading tables are confusing as written.
 - a. Action: It will be written in the TMDL that loads were first estimated using GWLF + BATHTUB, but model output loads from the irrigation pipes were too low given the TP concentrations observed. Therefore, the Kann & Falter data was used. Both tables will remain in the TMDL. **Also, updated septic and CDA River data will be on the final table.**
10. Due to significant data gaps, the TMDL should be updated soon.
 - a. Action: The TMDL will be written as a phased/Temporary/Incremental TMDL (see what is the appropriate language to use). The necessity for more data collection will be emphasized to update the TMDL.
 - b. Action: A detailed qualifier section will be written in the TMDL that emphasizes the data gaps, but the TMDL is the best effort for now.
11. Page 33 of the TMDL (under point source discharge section) add: "however, direct discharges into the lake are present. Due to legal exemptions/decisions, this discharge is an exemption under the NPDES permitting process. From this point forward this discharge will be identified as _____ (we need to come up with that term).
12. Page 52 of the TMDL delete "As previously stated, there are no point source discharges into Black Lake".
13. There was concern about TP inputs from the Mt. St. Helen's ash layer in the soils.
 - a. DEQ will investigate this in the literature.
14. There are an estimated 12 springs that discharge directly into the lake. They need to be monitored to get a better understanding of TP inputs into the lake. **This was addressed in the data gaps section**
15. Document this into the TMDL implementation section: road grading and other implementation by the Black Lake Shores Association has been done in the past few years to decrease direct runoff into Black Lake.
16. Write the TMDL with flexibility to allow for septic systems around the lake to be brought into a centralized sewer system.