



Public Services Department  
Water Reclamation Division

April 2, 2015

Paula Wilson  
Idaho Department of Environmental Quality

Dear Ms. Wilson:

The City of Post Falls appreciates the opportunity to comment on Discussion Paper #8: Implementation Tools, part of IDEQ's negotiated rulemaking for Water Quality Standards. As this discussion paper was general in detail, our comments address the overarching issues at hand. We look forward to providing more specific comments on further rule language.

The City is supportive of the conclusions contained in this discussion paper, specifically the statement "To effectively adapt to change, a variety of appropriate tools must be available for use." As is noted prior to that statement, all of the tools discussed are limited in their ability to address toxics from sources beyond the control of point source dischargers. The City requests that, in developing a package of implementation tools, these limitations be considered and, to the extent possible, mitigated.

Post Falls requests that consideration be given to toxics with each implementation tool considered. For example, the paper notes that water quality trading is not intended for toxics. The City suggests that adding provisions to use this tool for toxics issues might prove an effective way to accomplish toxics reduction while reducing possible severe impacts to municipal dischargers. As another example, the timeframe of variance should take into account the current lack of ability to measure toxics and lack of treatment technology available. Variance regulations should be written such that timeframes reflect the actual time needed to address the pollutant of concern which may be several (or many) permit cycles for some difficult pollutants.

Post Falls also supports the inclusion of an intake credit implementation tool. Language should allow for the use of intake credits for WQBEL's and should include provisions to include water (including groundwater) which would otherwise end up in the receiving water body. For example, Post Falls draws our drinking water from the Rathdrum Prairie Aquifer, which feeds the Spokane River – our receiving water body.

Again, the City of Post Falls appreciates the consideration given to our comments and the opportunity to provide them. Please feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "John Beacham".

John Beacham

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Environmental Manager  
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