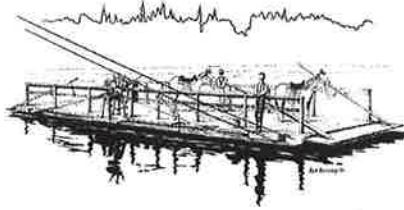


CITY OF BONNERS FERRY



Kootenai Valley Resource Initiative

August 1, 2014

Don Essig, Water Quality Standards Lead
Idaho Department of Environmental Quality
1410 N. Hilton
Boise, ID 83706

RE: Idaho Water Quality Standards, Triennial Review Comments

Dear Mr. Essig:

This letter is written to provide comments during the Triennial review period. Kootenai Valley Resource Initiative (KVRI) serves as the WAG for the Lower Kootenai/Moyie Watersheds.

The KVRI appreciates Idaho DEQ's commitment to continue protection of aquatic ecosystems from adverse warming caused by anthropogenic activities. The WAG also recognizes that some of the state's waters, in their natural and pristine condition, will not meet Idaho's temperature criterion at all places and at all times (i.e. Long Canyon Creek-Lower Kootenai). With this understanding, the KVRI WAG suggests that numeric temperature criteria, in section 250, include a statement such as "Unless superseded by the natural conditions criteria described in Section 054.04, the following criteria apply".

The KVRI supports Application of Temperature Criteria Standards (IDAPA 58-01.01/070.o7) section where the Director may raise the temperature criteria as they pertain to a specific water body upon the determination that existing uses would be fully supported at a higher temperature /criteria.

Also, the KVRI suggests a process be identified in the rules for the development of site-specific numeric temperature criteria for waters/watersheds where the ranges of natural temperatures are higher than the current generic numeric criteria.

Thank you very much for the opportunity to provide comment and for your consideration of our suggestions.

Sincerely,



Gary Aitken Jr., Chair
Kootenai Tribe of Idaho



Dan Dinning, Commissioner
Boundary County



Dave Anderson
Mayor, City of Bonners Ferry