

Greenferry Water and Sewer District
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January 5, 2020

To: Idaho Department of Environmental Quality Board of Directors

RE: Petition to the Idaho Board of Environmental Quality for Recategorization of a Portion of an Aquifer at Risk Pursuant to IDAPA 58.01.23

Dear Board of Directors:

The Greenferry Water and Sewer District Board wants to go on the record as supporting the petition to the Idaho Board of Environmental Quality for recategorization of a Portion of an Aquifer at Risk Pursuant to IDAPA 58.01.23. This petition was submitted by Jane Morgan and David Shults and accompanied by signatures from 289 residents within or near the District, also supporting the petition.

The Water District serves approximately 400 customers on the south side of the Spokane River near Post Falls. The water supply is from two groundwater wells. The depth of the groundwater aquifer serving the District's wells is only 125-150 feet. The wells are drilled into porous sands and gravels making them highly vulnerable to contamination. Copies of the well driller's reports were included with the petition.

The quality of the District's well water is exceptional but threatened by septic tank effluent. Septic tanks and drain fields are the only method of sewage disposal in the District and the installation of a central sewage treatment and disposal system is not on the horizon for the District for many decades.

In early July one of the members of the District received a letter dated July 7, 2020 from a hydrogeologist with the Idaho Department of Water Resources (IDWR, included with petition) explaining that they had completed an investigation of the Spokane Valley-Rathdrum Prairie Aquifer (SVRPA), including the area south of the Spokane River where the District's wells are located. IDWR determined that the District's wells are drilled into what is considered the SVRPA. The IDWR boundary also seems to coincide with the boundary of the Aquifer determined by the U.S Geological Survey studies in 2005 and 2007.

These studies also show the Aquifer extending to the south side of the Spokane River where the District's wells are located. These boundaries can be seen on the attached map that are downloaded from the Idaho Department of Environmental Quality Website.

It is the Board's understanding the Idaho Groundwater Quality Rule defines the boundary of the SVRPA, as established by the U.S. Environmental Protection Agency and is incorporated in IDAPA 41.01.01.110.03.c: "Rathdrum Prairie. That area of land situated in Kootenai County and more particularly defined by the USGS map describing the boundaries of the Rathdrum Prairie Aquifer identified and designated under the authority of Section 1424(e) of the Safe Drinking Water Act (PL 93-523) (Federal Register, Vol. 43, No. 28 -Thursday, February 9, 1978)". This is the reference in the Panhandle Health District Sewage Disposal Rules for the Rathdrum Prairie Aquifer, which are referenced in the Idaho Water Quality Standards.

This Aquifer boundary established in 1978 and used by the Idaho DEQ does not extend to the south side of the Spokane River, including the area of the District's wells. As a result the groundwater is not protected under the Idaho Groundwater Rule, as a "Sensitive Resource Aquifer".

The District's Board is very concerned about protecting the groundwater and its wells from further degradation as a result of development in the District. The Board would like to see the Groundwater Quality Rule changed in a way that would recharacterize the Spokane Valley-Rathdrum Prairie Aquifer to include the area within the District identified by these more recent groundwater studies by IDWR and USGS. The District would like to see the groundwater serving the District's wells afforded the same level of protection in the Idaho Groundwater Rule as other public drinking water supplies located only a few hundred yards to the north of the District's wells. The Board believes there is ample scientific data to show that a recharacterization of the Aquifer is justified and appropriate. Thank you for your consideration of these issues important to the Board.

Sincerely,

Steve Tanner – Chairman

Carol Rassier – Vice Chairman

Ron Utz - Director

Robert Stiger – Director

Rex Grace – Director

Cc: John Austin - District Manager
Bob Kuchenski – Water Operator
Roger Glessner - District Engineer