



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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DEPT OF WATER RESOURCES
SOUTHERN REGION

650 Addison Avenue West, Suite 110 • Twin Falls, Idaho 83301 • (208) 736-2190
www.deq.idaho.gov

C.L. "Butch" Otter, Governor
Curt Fransen, Director

November 17, 2014

Mr. Rob Williams
Williams, Meservy & Lothspeich, LLP
153 East Main Street
Jerome, Idaho 83338

Transfer #
78927
(37-262A)

Re: **City Coalition Use of the City of Gooding Aquifer Recharge Site**, Gooding County

Dear Mr. Williams:

This office has received and evaluated your November 12, 2014 letter requesting that the Department of Environmental Quality (DEQ) allow the ground water recharge of 1,500 acre-ft using the city of Gooding recharge site without following the approved monitoring plan protocol or submittal and approval of a project specific ground water monitoring plan.

After considering your request and the purpose for the planned recharge, please understand that we are unable to allow the planned recharge of surface water onto the city of Gooding recharge site without minimal ground and surface water monitoring. It is imperative for the preservation of the finite valuable ground water resource and the protection of public health that minimal monitoring be completed.

At this time we recommend that the coalition utilize the city of Gooding monitoring protocol. If the monitoring requirements seem unreasonable given the planned recharge activity then the coalition should develop a new monitoring and contingency plan, which meets the requirements set forth in Section 600, Land Application of Wastewater(d) or Recharge water in the Wastewater Rules (IDAPA 58.01.016) and comply with the Ground Water Quality Rule (IDAPA 58.01.11), described in DEQ Guidance for "Developing a Ground Water Quality Monitoring Program for Managed Recharge Projects by Land Application".

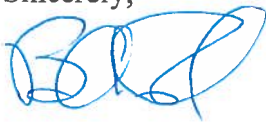
Please understand that the developed plan must include and detail the construction of two reasonably close down gradient shallow ground water wells and include surface water monitoring during the onset of recharge activities. The two monitoring locations cannot serve a public system and must be reasonably close to the recharge location. Biological and physical water quality parameters, including total coliform and E.coli, dissolved oxygen, pH, temperature, conductivity and turbidity need to be evaluated prior to and after the conclusion of recharge activities. Given the limited monitoring allowed for this instance, the recharge duration must not

exceed twenty days. Resultantly, the submitted plan must specify when the recharge activities will commence and cease; and affirm that the duration will not exceed twenty days.

We understand the urgency of your request, however our office must ensure ground water quality and public health will be protected and not be adversely impacted as a result of planned recharge activities. If the coalition still prefers to not utilize the approved city of Gooding monitoring protocol, then it must prepare a project specific proposal which meets the aforementioned requirements for our approval prior to commencing recharge activities.

If you have any questions, do not hesitate to contact this office at 736-2190.

Sincerely,



Brian A. Reed, PE
Technical Engineer I

BAR:gl

cc: Chuck Brockway, Ph.D, PE, Brockway Engineering, Twin Falls
Todd Bunn, City of Gooding
Alan Merrit, PE, IDWR, Twin Falls

ec: Irene Nautch, DEQ-Twin Falls Regional Office
David Anderson, DEQ-Twin Falls Regional Office
Toni Mitchell, DEQ-State Office