


From: [Kathryn Kolberg](#)
To: [Navigable Waterways](#)
Cc: [Tyler Warner](#); [Jason Peppin](#); [Timothy French](#)
Subject: IDL #L-96-S-2798A
Date: Wednesday, October 09, 2024 03:55:03 PM
Attachments: [PHD Additional Comments IDL #L-96-S-2798A.pdf](#)

Good Afternoon, Tyler –

Please see attached for Additional PHD Comments regarding IDL #L-96-S-2798A.

If you have any questions, please let me know.

-Kathryn

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|  Public Health <small>Prevent. Promote. Protect.</small> Panhandle Health District | Kathryn Kolberg Environmental Health Program Manager 2101 W. Pine St., Sandpoint, ID 83864 Office: 208-265-6384 Office Desk: 208-920-7902 Email: kkolberg@phd1.idaho.gov Web: Panhandlehealthdistrict.org |
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Oct 9, 2024

Idaho Dept of Lands (IDL)

Tyler Warner, Land Resource Specialist, Navigable Waters

2550 Highway 2 West

Sandpoint, ID 83864

Email: navigablewaterways@idl.idaho.gov

RE: Agency Request for PHD Comments on IDL Application #L-96-S-2798A for a Commercial Marina, to install riprap, to install a pedestrian bridge and to dredge on Lake Pend Oreille.

Dear IDL –

This letter is intended as **Additional Comments** to the original **Panhandle Health District (PHD) Agency Review Letter dated Oct 4, 2024.**

PHD attended the Public Hearing on Oct 7, 2024, and would like to respond to a public comment made by Mr. Monks. Mr. Monks indicated that as a professional Hydrologist he completed a Nutrient Pathogen (NP) Study for a previously proposed Large Soil Absorption System (LSAS) on the land associated with this project. I believe Mr. Monks comment was made in response to information that originated in the *Oct 4 PHD Agency Review Comment Letter* in which I said the following:

"If the proposed activities and uses will generate wastewater flows of 2,500 gallons or more, the site must be capable of meeting the more protective standards of a Large Soil Absorption System (LSAS), per IDAPA 58.01.03.013 and IDAPA 58.01.16. PHD & DEQ have never assessed this site for LSAS suitability. If the site is incapable of meeting LSAS criteria, then any proposed project must generate less than 2,500gpd. It is unclear how much wastewater the current proposal will generate, as PHD does not have adequate information to determine that."

PHD would like to clarify that if Mr. Monks NP study was completed for the previously proposed LSAS associated with expired PHD application #06-09-101173, the land assessed for that LSAS is not the same land that has been more recently proposed for a septic system to serve this project. The parcel assessed for the

Sandpoint – Bonner County
2101 W. Pine St.
Sandpoint, ID 83864
208.265.6384

www.PanhandleHealthDistrict.org

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LSAS in 2004 -2007 (that was never installed) was #RP57N01E164950A and located east across Highway 200, further from surface water. It appears that parcel number no longer exists, and the land is currently under different ownership.

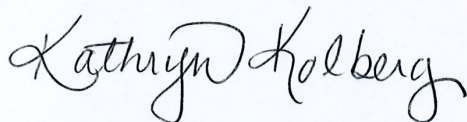
The most current application (now expired) submitted to PHD in 2020 (CSEW file # 15-146108) indicates an intention to place a drainfield on parcel RP57N01E166160A, which is closer to surface water and on the west side of Highway 200. PHD does not know how Mr. Monks 2007 NP study may relate to any current sewage system proposal on this parcel, or potential NP studies that DEQ may require. Idaho DEQ is the agency that determines when NP studies are required and how they relate to proposed wastewater disposal applications. Information about septic system rules and guidance can be found on Idaho DEQs website under the *Septic and Septage* page.

In summary, PHD just wanted to add some clarifying comments to ensure the record is clear that, at this point, PHD does not know how much blackwaste/wastewater would be generated by the current proposed uses. PHD did complete a site evaluation based on a 2020 application for a proposed drainfield (receiving less than 2,500gpd) on parcel RP57N01E166160A. PHD did not complete a current evaluation for a system to be placed on parcel RP57N01E166160A that would receive 2,500gpd or more of wastewater.

Any current proposal that will generate blackwaste & wastewater, is required to have an approved means of treatment and disposal for those wastes. If the applicant would like to work with PHD to establish the nature and quantity of the wastewater proposed, they should submit a Current Application and detailed Letter of Intended Use.

If you have any questions about this information, please contact me at (208) 920-7902 or KKolberg@PHD1.Idaho.gov

Regards,



Kathryn Kolberg, REHS, PHD Environmental Health & Protection Program Manager

cc: Tim French, PHD REHS

Jason Peppin, REHS, PHD Division Administrator-Environmental Health & Protection