



Upper Columbia River Group

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October 29, 2008

Honorable Bonnie Mager
Honorable Todd Mielke
Honorable Mark Richard
Spokane County Commissioners
Spokane, Washington

Re: Spokane County Wastewater Treatment Plant

Dear Spokane County Commissioners,

In advance of your November 18 meeting in which you will consider approval of a contract for the proposed Spokane County treatment plant, Sierra Club Upper Columbia River Group and the Center for Environmental Law & Policy offer these observations about the County's current process. Recent events highlight issues relating to the need to add sewage treatment capacity and to substitute sewer lines for septic systems to protect the Spokane Valley-Rathdrum Prairie Aquifer. We urge the Commissioners to reconsider the technology choices it has made to date – before the commitments become irrevocable.

Spokane County will likely never be granted a permit to put effluent in the river during summer months. The County needs an alternate plan that results in zero discharge, at least during critical months (April-September). We agree that Saltese Flats is an excellent site for wetland restoration. However, Saltese Flats may not be an appropriate place to store reclaimed wastewater for re-infiltration into the SVRP Aquifer. Our community does not want endocrine-disrupting pollutants in our water supply. The County should aggressively identify customers for its reclaimed wastewater. Given that end use is the key to operating the plant, the County might want to reconsider siting.

Septic proliferation is a problem of the County's making – change in approach needed. While all would agree that reducing the number of septic systems on the SVRP Aquifer is an important goal, the problem of septic proliferation is a result of the County's own ultra pro-growth practices, combined with lenient requirements for sewer connections and a unitary approach to sewer development. We urge you to limit the issuance of permits that rely on septic and to create a program to require developers to pay for and install small-scale, on-site sewage treatment "package" plants that treat and recycle water at the source. The technology for small-scale sewage treatment is used in many places, including the Gozzer Ranch Golf Club wastewater system on Lake Coeur d'Alene.

MBR is not the best technology, but it is just about the most expensive. The County is leading the public down a path it cannot afford. The County's technology of choice, MBR or membrane bio-reactor treatment, will not remove phosphorus – the critical problem for the Spokane River – to necessary levels. It is, however, one of the most expensive technologies for sewage treatment, both in terms of installation, energy costs, and operation. One of the few benefits arising from delay of the dissolved oxygen clean-up plan is the development of new – and much cheaper – technologies that are capable of efficiently removing phosphorus to the levels necessary to meet Spokane River requirements. Dual sand treatment is proving effective at a fraction of the cost of MBR. We urge you to re-think technology options for the plant, and to seriously consider the fiscal impacts of your decisions. You can and should avoid imposing massive new utility fees on the public.

Plant design is inadequate to address overflows. Another big problem with MBR technology is its lack of redundancy to address overflows. As currently designed, the County apparently intends to rely on the

City to treat its overflow. That will be a problem when the City is overwhelmed with its own overflow, or if the City declines to take the County's overflow. Even if available, future overflow from the County plant would require treatment at the highest standard, without a compliance schedule (that is, immediate compliance will be required). The failure to address this aspect of design increases the likelihood that the County will be unable to obtain a permit. At present, the County's proposed discharge into the Spokane River is directly upstream of downtown. Overflows into the Spokane River at this location would be completely unacceptable to the community, and to the regulators who must approve the plan.

The County's proposed offset program will not pass legal muster. The County proposes to use septic offsets (removal of septic systems and associated phosphorus from the SVRP Aquifer in exchange for discharging phosphorus into the River). This plan does not meet legal requirements. Just as local dischargers were misled by EPA's interpretation of the Clean Water Act, the County is being misled by the state's interpretation of the regulation governing water quality offsets.

Time for innovation. New and cheaper approaches are available to address sewage treatment. Alternatives are available. The Spokane region would be best served by a thorough review of the technology and reuse choices associated with the County's proposed treatment plant.

The Department of Ecology's efforts to expedite the County plant, including its "provisional" approval of the wastewater facilities plan, and waiver of the County's non-compliance with the Growth Management Act, neither addresses nor solves any of the problems above. We believe these actions by Ecology may lull the County into thinking the treatment plant as proposed will be permitted. It will not.

We urge the County to reconsider its approach to wastewater treatment before entering into contracts that will commit the County, and County taxpayers, to exorbitant technology that does not work.

Yours very truly,



Rachael Paschal Osborn
Spokane River Project Coordinator