



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47600 • Olympia, WA 98504-7600 • 360-407-6000

711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

June 22, 2007

Rick Eichstaedt
Center For Justice
35 West Main, Suite 300
Spokane, WA 99201

RECEIVED
JUN 28 2007
CENTER FOR JUSTICE

RE: Comments on Proposed Reissuance of NPDES Permits for Spokane River

Dear Mr. Eichstaedt:

Thank you for your letter dated April 26, 2007 expressing your concerns regarding the Environmental Protection Agency (EPA) draft National Pollution Discharge Elimination System (NPDES) permits for point source discharges in Idaho on the Spokane River.

As you are aware, the Department of Ecology and a wide variety of stakeholder interests from Idaho and Washington, including the Sierra Club and EPA, recently completed a two-year collaborative process for addressing water quality concerns and issues for the Spokane River. During this collaborative process, the stakeholders agreed to a managed implementation plan which will lead to an improved river and, we believe, ultimately, to compliance with water quality standards for dissolved oxygen in Lake Spokane. While there are no immediate solutions to these long-term problems, the strategies offered in the managed implementation plan will make a significant difference in terms of reducing the pollution load to the river in both Idaho and Washington.

Although the TMDL that we have developed for the Spokane River does not extend across the border upriver into Idaho, the phosphorus reductions that EPA is proposing to require in the draft NPDES permits for Idaho dischargers to the Spokane River will result in very large reductions in pollutant loading on a scale similar to the reductions that are proposed within Washington State.

An important aspect of the managed implementation plan for the Spokane River is a robust, comprehensive water quality monitoring program. Water quality monitoring and accountability are critical to the success of this water quality management effort and I fully expect that the ten-year assessment, as described in the managed implementation plan, will answer your fundamental questions. Simply put, water quality monitoring will reveal, one way or the other, the effectiveness of our actions. Monitoring results will also validate or refute the accuracy of our water quality modeling work, including verifying model assumptions, tracking changes in dissolved oxygen concentrations, and our collective ability to comply with water quality standards.



