

May 31, 2005

Mr. Bruce Rawls  
Spokane County Utilities Director  
1026 W. Broadway  
Spokane, WA 99260-0430

Dear Mr. Rawls:

Thank you for your public comment letter received on December 20, 2004, regarding Washington State's Water Quality Assessment for 2002/2004. The department received over 45 comment letters during this last review process and is appreciative of the time you took to review and comment on this assessment. We realize that there is an extensive amount of information in the Water Quality Assessment. The scrutiny given by you and other public reviewers has resulted in many changes and corrections that improved the accurateness of the final submittal to the Environmental Protection Agency (EPA).

The Water Quality Assessment is being submitted to EPA as an "integrated report" to meet the Clean Water Act requirements of sections 305(b) and 303(d). EPA will only take approval action on Category 5 of the assessment, which represents the state's 303(d) list. The Water Quality Assessment can be viewed at <http://www.ecy.wa.gov/programs/wq/303d/index.html>.

You express concerns in your comments that Ecology has initiated a TMDL study for dissolved oxygen prior to being placed on the 303(d) list. It is important to note that one of the purposes of the 303(d) list is to trigger further studies and monitoring to determine the extent of the problem, and to develop cleanup plans (also known as TMDLs) to correct the problems. Study results may identify other pollutants that should be included in the cleanup plan, even if they were not previously a part of the 303(d) list. This makes sense from both a practical and economic standpoint, since the focus and study of the water quality problems should be dealt with collectively as much as possible.

The Spokane River TMDL study was requested and initiated by Ecology in 1998 to better assess the accumulative impacts of expanded wastewater discharges to the Spokane River system due to several proposed wastewater discharge expansions in Washington and Idaho. The Spokane River and Lake Spokane were known for many years to have depressed oxygen in various reaches, but the extent was not clear. It was well documented that Lake Spokane had depressed oxygen beyond natural conditions but, before the CeQual-W2 model was developed there was no way to assess what natural conditions might have been, and then evaluate the cumulative effects

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of pollutant loading. The city of Spokane acknowledged that the most critical impacts on dissolved oxygen from their discharge would occur in Lake Spokane, but they said they were unable to evaluate the cumulative impacts of expanded pollutant loading to Lake Spokane.

Ecology concurred with the city and proposed that a basin-wide TMDL evaluation of oxygen demanding pollutants be performed along with an update to previous phosphorus and algae modeling to address concerns with algae blooms in the upper lake. The question of whether it was on a 303d list was not an issue at the time. Now that the model is working we can make listings with more certainty.

You have concerns with two dissolved oxygen listings (40939 and 15188) which were collected in 2001 and were not on the 1998 303(d) List. I have enclosed copies of the two studies cited for your information.

Thank you again for taking the time to provide comments to Ecology. If you have questions regarding the above responses, or would like further clarification, please feel free to call me at 360-407-6414.

Sincerely,

A handwritten signature in cursive script that reads "Susan Braley".

Susan Braley  
Unit Supervisor  
Watershed Management Section

Enclosure