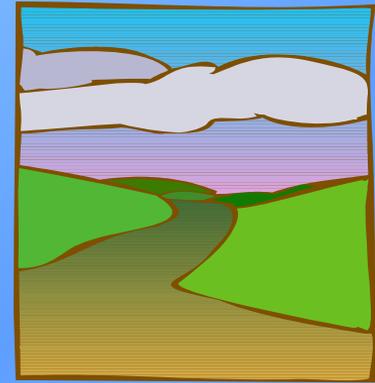


Hangman Creek Watershed TMDLs

Which way do we go?



Our Path So Far...



- Develop TMDLs for fecal coliform bacteria, temperature, turbidity and total phosphorus
- 2004 study - collect data to be used in analysis
- 2005-2006 - analyze bacteria and temperature data
- 2006-2007 - develop WARMF model to analyze phosphorus and suspended solids loading
- 2008 - complete and submit TMDL to the Environmental Protection Agency for approval

What's changed?

Initial EPA review:

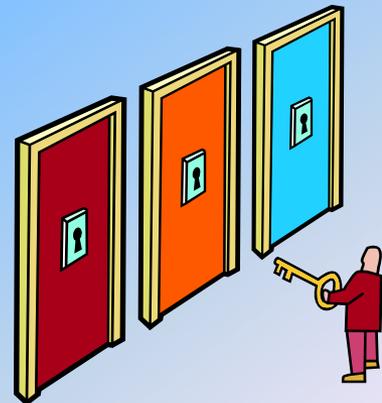
- Total phosphorus portion is not a TMDL
 - Does not address an impairment in Hangman Creek
 - Does not ensure phosphorus (or other limiting nutrient) reductions are restrictive enough to protect Hangman Creek for dissolved oxygen and pH
 - Does not address the other nutrient (CBOD & NH₃) allocations set by the Spokane River DO TMDL

What has not changed?

- Spokane River DO TMDL sets allocations for phosphorus at the mouth of Hangman Creek
- Significant quantity of phosphorus comes from Hangman Creek
- For the Spokane River and Lake Spokane TMDL to be successful, phosphorus sources in Hangman Creek Watershed must be controlled
- We need a strategy to meet the phosphorus allocations at the mouth

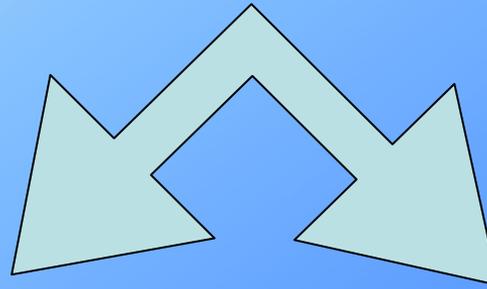
Ecology's Options

- We could argue that the phosphorus effort protects dissolved oxygen and pH in Hangman Creek and therefore qualifies as a TMDL
- Separate TMDL - We could collect the necessary dissolved oxygen, pH and nutrient data to develop DO and pH TMDLs which would set allocations for the limiting nutrient (possibly phosphorus)
- We could develop a phosphorus reduction plan



What do these options look like?

TMDL



Phosphorus
Reduction Plan

- Specific WLA for each facility
- 10 Year compliance schedule
- Federal regulations
- Address bacteria, temperature, turbidity and phosphorus (DO and pH?)

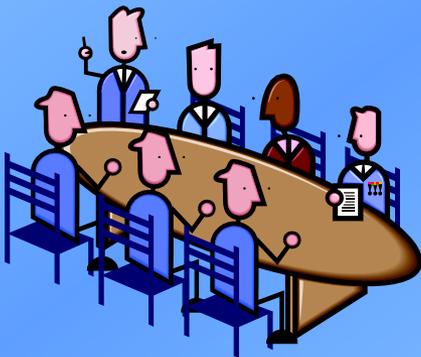
- Whole watershed approach
- Schedule sync up with Spokane TMDL
- More flexibility
- Current P modeling results will guide the plan
- TMDL for bacteria, temperature and turbidity will still be submitted and will help reduce nonpoint phosphorus

Requirements for doing a Phosphorus Reduction Plan

- Participation from all point sources and nonpoint sources
- Commitment to develop a whole watershed approach
- Agreement outlined in a Memorandum of Agreement and signed by all parties
- Deadline for when the plan will be completed
- A plan with timelines for meeting interim and final targets
- Understanding that elements in the plan will be translated into NPDES permit requirements

Who needs to participate?

- Department of Ecology
- All six point sources
- Spokane County Conservation District
- Entities under the stormwater permits (city, county, WSDOT)
- Coeur d'Alene Tribe & Idaho
- Spokane County
- Any other entities addressing nonpoint sources



Your thoughts?

Which way do we go?

