

From: Mike Petersen [mailto:mpetersen@landscouncil.org]
Sent: Saturday, March 04, 2006 4:13 PM
To: Peeler, Dave
Subject: Spokane MIP

Dave,

I am sure many others are giving you specific, direct responses to Version 2 of the MIP, but I wanted to share a few thoughts on the process.

1. Having the Phosphorous bill pass (it will likely be tweaked a little so Senate and House versions match) is significant and I think we can give a lot of credit to Spokane leaders who testified in Olympia. This should be translated into pounds of Phosphorous taken off the "Delta". I realize it is hard to translate into an exact number, but assuming a reduction year by year would be a good strategy.
2. A non-point commitment of funds by the dischargers is very important, and precedent setting. I believe it will lead to many good things in the watershed and should be rewarded. The controversy in the upper part of the Little Spokane River (at and below Sacheen Lake) is a case example where homeowners on the lake are discharging because of septics, and the beaver dams below the lake, which probably do a great job at trapping phosphorous containing sediment, are routinely blown up. A pot of money could grease the skids to a solution that would lower the phosphorous in the Little Spokane.
3. I like the idea of setting the treatment plant discharges based on pilot testing - which seemed to be what the MIP was leading to, then at the end the limits seemed to be reset to the 10 ppm that is such a hurdle to get over. I realize this makes it difficult for the new source of pollutants (Spokane County/Valley) who are not allowed to phase in - maybe Ecology can be creative and have the County put up more dollars for non-point OR give them a pounds of Phosphorous limit and not a concentration limit, which would require them to get out of the river when they reached the pound limit.
4. There was always a question about the accuracy of the model runs and the need to re-examine BOD, etc. in Lake Spokane. I hope this can be worked into the MIP in the near term.
5. Testing protocols indicated a wide variance between tests and split samples, especially at the detect limits that we are striving for. The MIP should have an agreed upon protocol so we aren't testing apples and oranges.

Finally, I think Ecology did a good job trying to strike a balance and I thank you for the shuttle diplomacy that you and Bill Ross have done. If we are able to get a preview of your next round at least a week before the next full group meeting it would be helpful, in case there are any misunderstandings that could be cleared up before airing it in public.

Thanks,

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