

UTILITIES DIVISION
N. BRUCE RAWLS, P.E., DIRECTOR
A DIVISION OF THE PUBLIC WORKS DEPARTMENT

August 1, 2012

Adriane Borgias
Spokane River Water Quality Lead
Washington State Department of Ecology
4601 N. Monroe Street
Spokane, WA 99205-1295

delivered via email to: abor461@ecy.wa.gov

Subject: Response to Ecology Review of Phase I Study for Bioavailable Phosphorus (BAP)

Adriane,

Thank you for the opportunity to provide comments on Ecology's "***Review of Phase I Bioavailability Study and Decision for Funding of Phase II***" dated July 16, 2012.

While we can understand the detailed nature of many of Ecology's comments, we are unclear with Ecology's position that the:

"...overriding interest in funding Phase I or any future phase is supporting research that can justify modified permit limits for total phosphorus in a reasonably short timeframe..."

Spokane County is not anticipating that the completed phase I study, or the proposed phase II study, were designed with the "overriding interest" to justify modified NPDES permits in a reasonably short time frame. Instead, we support these studies because a better understanding of bioavailable phosphorus (BAP) and associated nutrient dynamics are believed to be important components of improving water quality in the Spokane River and in Lake Spokane.

The phase I and proposed phase II studies have been set up to quantify the ratio of BAP to total phosphorus (TP) in regional advanced wastewater treatment processes. We believe phase I of the study quantified that ratio (and associated variability) along with uncovering topics for additional study. Further, we believe the proposed phase II study will address most of the unanswered questions from phase I and we look forward to the results of that work.

It is uncertain if understanding BAP will lead to NPDES permit modifications, in the short-term or long-term. However it does seem reasonable when large nutrients sources are reduced (and chemically altered) through advanced treatment that we should investigate to better understand how these reductions may impact the Spokane River. Hundreds of millions of dollars are being invested by local citizens and industries to achieve valuable improvements in water quality.

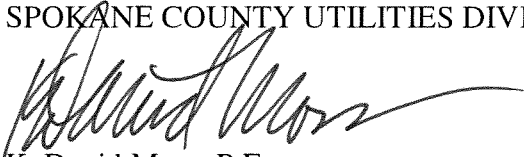
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Spokane County recognizes there is uncertainty associated with applied water quality research, but we also recognize that water quality improvements in the Spokane River are a long-term process. A better understanding of Spokane River-Lake Spokane water quality is needed on multiple aspects, including BAP, and we are eager to work with Ecology and others to gain that understanding. As we gain a better understanding of the Spokane River we believe such knowledge should be incorporated to improve the water quality models that represent the river.

Please see attached a draft scope of work for a phase II BAP study. We, along with other stakeholders, are considering options to move forward with additional study, even without funding from Ecology. Please let us know if you have any comments on the draft study plan.

Also, please direct questions on this topic to Ben Brattebo, Water Resources Specialist, Spokane County Utilities Division, 509-477-7521 or: bbrattebo@spokanecounty.org.

Sincerely,
SPOKANE COUNTY UTILITIES DIVISION



K. David Moss, P.E.
Water Reclamation Manager

CC: Bruce Rawls, Spokane County Utilities Director
file

enclosure