



**UTILITIES DIVISION**  
808 W. SPOKANE FALLS BLVD.  
SPOKANE, WASHINGTON 99201  
509.625.6270

April 15, 2014

Adriane Borgias  
abor461@ecy.wa.gov  
Washington State Department of Ecology  
Eastern Regional Office  
4601 North Monroe  
Spokane, Washington 99205-1295

RE: Measurable Progress Definition DRAFT 3-26-14

Dear Adriane,

Thank you for the opportunity to review and comment on creating an understanding of how to evaluate measurable progress as referenced in the NPDES permit for the Spokane River Regional Toxics Task Force. The NPDES permits issued to the Washington dischargers to the Spokane River provide that the Regional Toxics Task Force is to make measurable progress towards meeting applicable water quality criteria for PCBs in the Spokane River. The City of Spokane welcomes the opportunity to provide comment and feed back to the draft "definition". The concept of making measurable progress towards achieving water quality criteria is a new innovative approach towards meeting applicable water quality criteria for the entire River.

As you are aware the City of Spokane owns and operates municipal wastewater and stormwater systems that discharge directly into the Spokane River. Section S 16 of Spokane's NPDES permit requires Spokane to "participate in a cooperative effort to create a Regional Toxics Task Force and participate in the functions of the Task Force." Further, it provides, "the goal of the Task Force will be to develop a comprehensive plan to bring the Spokane River into compliance with applicable water quality standards for PCBs."

First, Spokane would like to thank Ecology for all of their hard and thoughtful work in reviewing and formulating a draft definition of measurable progress. We also would like to thank Ecology for its partnership and guidance throughout the development and formation of the Toxics Task Force and its guidance and support towards meeting permit requirements.

Second, Spokane agrees that defining measurable progress is an ongoing process and that achieving the goal of water quality will take several permit cycles. As such, use of the concepts of Inputs, Outputs and Outcomes, as they change over time, may be a helpful evaluation tool. Spokane further agrees that reduction of toxic inputs to the Spokane River, such as wastewater, stormwater, and CSO outfall controls should be recognized as an outcome because environmental response in the riverine system may take several permit cycles or even decades to achieve. Spokane has been a regular and active paying participant in the Toxics Task Force since its inception, in addition to being an active participant in the Spokane River Stewardship Partners.

Third, the City of Spokane has and will continue to make measurable progress towards meeting applicable water quality criteria for PCBs once the Integrated Plan is approved and the funding commitment is secured. Through the partnership with Ecology, Spokane created an Integrated Clean Water Plan, which on March 14, 2014 was submitted to Ecology for review and approval. This Plan provides for substantial reduction of PCBs from reaching the Spokane River by addressing and removing stormwater in addition to CSOs and municipal wastewater treatment, including the next level of treatment (NLT). Spokane has voluntarily included stormwater management in its integrated planning process as well as operating the NLT membrane filtration system through the non-critical season to reduce pollutant loads to the Spokane River. Once this Integrated Plan is approved and the Interlocal Agreement between Spokane and Ecology is finalized, Spokane will be positioned to undertake the outlined projects in order to achieve the goal of a Cleaner River Faster. This benefits the Spokane River as well as the entire region.

These are exciting times for the Spokane Region, Ecology, the dischargers, and our community. We very much look forward to the continuation of our partnership and collaboration with Ecology, the Toxics Task Force, and others in making measurable progress towards meeting water quality criteria.

Sincerely,

A handwritten signature in black ink that reads "Rick Romero". The signature is fluid and cursive, with the first name "Rick" and last name "Romero" clearly legible.

Rick Romero  
Director  
Utilities Division

Cc: Grant Pfeifer, Washington State Department of Ecology  
Jim Bellatty, Washington State Department of Ecology  
Elizabeth Schoedel, Assistant City Attorney  
Dale Arnold, Director, Wastewater Management