

## Riverkeeper Feedback/comments on Draft SRRTTF Comprehensive Plan - 10.7.16

Riverkeeper's feedback will take two forms. This document includes both global comments on the draft comprehensive plan, and textual recommendations and/or comments noted by page and section in the draft.

### Global recommendations:

Many of the following comments are based on a section in the Scope of Work Development of the comprehensive Plan – 11/19/2015, Page 3, and bullet 10. It reads as follows:

*“Recommended Implementation Plan: Defines the specific PCB management practices recommended for implementation, the recommended schedule for their implementation and a monitoring program with measurable milestones to assess implementation effectiveness. The plan will estimate pollutant loading into the watershed and the expected load reductions, establish reasonable time limits for correcting the specific problem, **and include interim targets when appropriate**. The plan will include an adaptive management component to allow for course corrections if necessary”.*

- The Comprehensive Plan (CP) will be the guiding document that informs the work of the SRRTTF (the purpose of which is spelled out in the MOA) for the foreseeable future. With that in mind the draft plan will need to include the essential component of “targets”. Interim targets are to be included in the CP as they are inside the LimnoTech Scope of Work. The work plan is well conceived and should be followed if we are to have an outcome-based CP. The reason is four-fold:
  1. First, the need for “targets” was included in the Final Scope of work, page 3, bullet 10.
  2. Second, generally any plan that is designed to accomplish a set of outcomes must envision and define those outcomes. This by virtue of what we know about effective planning across disciplines is a best practice.
  3. Finally, the metric for success of the Comprehensive Plan and the SRRTTF is Measurable Progress. A Measurable Progress determination should be connected to the Comprehensive Plan goals for desired “targets” which should be the “outcomes” that are defined in the measurable Progress document.
  4. Finally, interim targets are essential if we are to adaptively manage the work of the SRRTTF. In order to adjust and work on cleaning up the river we will need to adjust the work based on what we learn about the effectiveness and efficiency of control actions.

The way that targets are included and folded into the CP could take several forms. While the Work Plan suggest that these would be a part of Chapter 5 “Implementation Plan”, this part of the CP could also be included in Chapter 6, “Future Activities”.

In both scenarios this information would be an addition that would conform to the format that has already been established in the draft CP. That is interim targets would be assigned to the control Actions inside the appropriate categories. Category A, Category B, and Category C are appropriate control actions for targets, while Category D and E seem not to

be appropriate for the assignment of interim targets.

If these targets were to be included in Chapter 5 then this could take the following table form:

Control Action Category	Control Action Sub Category	Delivery mechanism	Estimated PCB Loading /mass (Table 1, page 12)	Interim Target (Goals)	Time Limit
Category A	Waste Water Treatment 5.1.1-5.1.3	WWTP's			5.1.4 Five year cycle
	Remediation of Contaminated Sites 5.2.1-5.2.3	Ground water  Surface water NPS			
	Storm Water Controls 5.3.1-5.3.2	MS4/Storm drains			
	LID Ordinance 5.4				
	Street Sweeping 5.5.1				
	Purchasing Standards 5.6.1				
Category B	Green Chemistry 5.7.1-5.7.2				
	Product Testing Info 5.8.1-5.8.2				
	Waste Disposal Assistance 5.9.1-5.9.2				
	Regulatory rule making 5.10.1 -5.10.2				
	Compliance with PCB regulations 5.11				
	Emerging End of Pipe Storm Water Technologies 5.12				
Category C	Building demolition and renovation Control 5.13				
	Identification of Sites of Concern for Contaminated Ground Water 5.14	↓	↓		↓

The above information could be developed and presented in section 6 under Future activities. This could be 6.2 - Assessment of control action effectiveness and the achievement of measurable progress.

- It would be inside this chapter, perhaps 6.3, that the relationship between the goals of the Comprehensive Plan – water quality improvement - and the measurable progress

determination is defined. These two concepts and processes should be linked and that relationship explained in the CP, section 6.3. **We feel that the numerical targets in the work plan should be the basis for the measurable progress determination (in the form of “outcomes”).** The CP and the MP process should be working together and reference each other. The essential components of the measurable progress determination process should be briefly explained in the section of the plan.

#### **Text comments:**

- The use of the word category for control actions in Table 3 is different than the use of the word category A B C D and E types of control actions. The former are a type of control action and the latter refer to the status of implementation in by the members of the SRRTTF. This is a bit confusing. Maybe consider using Type and Sub-type for Table 3.
- On page 1, please add in paragraph 2 a statement explaining the requirement to make measurable progress or default to the development of a TMDL:  
Example: *“If Ecology determines the Regional Toxics Task Force is failing to make measurable progress toward meeting applicable water quality criteria for PCBs, Ecology would be obligated to proceed with development of a TMDL in the Spokane River for PCBs or determine an alternative to ensure water quality standards are met.”*
- Page 2, 4<sup>th</sup> bullet in the Implementation Plan – add language from the scope of work.  
*“The plan will estimate pollutant loading into the watershed and the expected load reductions, establish reasonable time limits for correcting the specific problem, including interim targets when appropriate.*
- On page 9, Section 2.5 - Impairment Status, the last sentence says “PCBs are not listed in Idaho”. Should this be *the Spokane River is not listed on the 303 d list in Idaho* - ?? Check this.
- In section 5.3.1 under NPDES Permits for MS 4s, it states the dates for permit cycle. Please add the same information for Idaho and Washington NPDES permits on pages 31, 32, 34 – sections 5.1.1, 5.1.2 and 5.1.3.
- Cut the last sentence in section 6.3.1 . This sentence about age studies and PCBs is appropriate in concept, but too fine-grained for a comprehensive plan and therefore seems misplaced.