

Potential Options for SRRTTF Future

August 2022

Background

At recent Task Force meetings, discussions have been held about the future of the SRRTTF. These discussions have been prompted by the fall 2021 EPA announcement that work was beginning for preparing a PCB TMDL for the Spokane River, as a settlement to a lawsuit on the matter.

The Task Force process was a voluntary alternative to the traditional TMDL process, but with the EPA TMDL announcement, many have wondered if the Task Force still has a purpose for existing. Also, representation on the Task Force has also been reduced in recent years, raising a question about whether the Task Force current makeup represents a broad enough cross-section of the community? Ecology has also acknowledged this uncertainty in the recent draft discharge permits, where language has been broadened to require dischargers to participate in the Task Force or similar community-based process.

Additionally, the ongoing administrative burden of managing the Task Force provided by the Administrative Contracting Entity (ACE) is substantial, and some of those volunteering for positions on ACE have indicated they do not plan to continue providing this support into the future.

At the April Task Force meeting, an ad hoc group was organized to frame the issue and develop some options for consideration – addressing organization purpose, administration burden and representation. Several Task Force members volunteered to serve on this group, including Rob Lindsay, Jeff Donovan, Brent Downey, Tom Agnew, Lisa Dally Wilson and Adriane Borgias.

An initial meeting was held and a summary of the discussion from that meeting was shared at the May 2022 Task Force meeting. The group met again on June 23 and Doug Krapas also joined. The group was able to develop a draft concept path forward for the Task Force that can be used by Ecology, as the lead for this effort, to update and then share with the Task Force as a draft at the next meeting, scheduled for August 24.

Draft Concept Path Forward

The draft concept builds on one of the options (Option 3) provided in the May update to the Task Force. This is a two-part concept path forward addressing:

- 1) Time period between now and June 30
- 2) July 1, 2023, through at least the time required for Ecology to develop the Spokane River PCB TMDL implementation plan.

Now through June 30, 2023

- Continue ACE and the Task Force per the current structure through June 30, 2023. On June 30 the Task Force and ACE would be dissolved as organizations.
- Ecology to determine how to establish a new community-based organization with broader representation and updated purpose(s). Ecology will seek input from the Task Force along with other stakeholders during this time. Ecology will also coordinate with EPA on this effort.
- Task Force members will work with the State Legislature to support 2023-2025 biennium funding of \$2 million to support establishing future community-based organization and preparation of PCB TMDL implementation plan by Ecology.

July 1, 2023, through Preparation of PCB TMDL Implementation Plan

- Ecology (or Ecology/EPA, as applicable) will establish the new community-based organization/advisory committee by July 1, 2023, provide administrative support, and receive input from this organization during the TMDL development process and the Ecology preparation and approval of the implementation plan.
- Community members will support future State funding requests for Ecology for PCB TMDL implementation plan and the new community-based organization.