



February 23, 2006

Washington Department of Ecology
Mail Stop PV-11
Olympia, WA 98504

Attention: Dave Peeler

Regarding: Draft Spokane River Water Quality Managed Implementation Plan (MIP)

Dear Dave:

The City of Airway Heights has reviewed the Draft MIP for the Spokane River dated January, 2006. Based on our review we offer the following comments:

The City of Airway Heights is not mentioned in the draft proposal. Although the City does not hold a NPDES permit to discharge to the Spokane River, we do have an agreement with the City of Spokane for 680,000 gpd of treatment capacity in the Regional Plant. This is similar to the arrangement between the City of Spokane and Spokane County. The phosphorous goal and allocation provided on page 2 for the City/County should also include the City of Airway Heights.

The City of Airway Heights is the only sewer purveyor that currently discharges to the Spokane River who has an approved Wastewater Facilities Plan that provides for complete discharge elimination. The City's capacity in the Regional plant and the associated phosphorous allocation is an asset held by the City of Airway Heights. At some great expense to the City (over \$23 million) this allocation may be made available to other dischargers.

Page 12, Section 2.1.2.5.2 suggests that the County holds a prorated share of the phosphorous load allocation (2.93 lbs. day) of the Regional Plant. The City of Airway Heights' share of this allocation should also be recognized.

Page 17, Section 4 indicates that the City of Airway Heights will be required to implement aggressive water reclamation and re-use programs as an element of their Wastewater Facility Plan. This has already been implemented by Airway Heights and approved by WSDOE. This should be recognized in the MIP.

The City of Airway Heights currently has no storm water discharges to the Spokane River and has aggressively controlled storm water treatment and disposal through it's public works standards and local ordinances.

Thank you for the opportunity to comment on the Draft MIP proposal. The City looks forward to working with the Department of Ecology on the collaborative effort to clean up the Spokane River. Please call with any questions regarding these comments.

Sincerely,



Charles Freeman
City Manager

C: Albert Trip, Public Works Director
Dennis D. Fuller, P.E. Century West Engineering Corporation
Larry Esvelt, P.E., Esvelt Environmental Engineer
Mayor Matthew Pederson
Stanley Schwartz, City Attorney
Tom Lien, Community Development Director