

Defenders of Wildlife

Defenders of Wildlife and our members support increasing TDG standards to 125% (alternative 3). Attached is our organizational comment letter and a petition from 527 of our Washington members and supporters in favor of alternative 3.

If you have any questions or issues accessing these documents, please contact me at 206-883-7401.

Thank you.



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February 27th, 2019

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Department of Ecology
Water Quality Program
P.O. Box 47600
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Comments submitted electronically

RE: Environmental Impact Statement for Short-Term Modification to Adjust Total Dissolved Gas Levels in the Columbia and Snake Rivers.

Dear Director Bartlett,

Thank you for the opportunity to provide comments to the Department of Ecology (Ecology) related to the proposed short-term modifications to the state's total dissolved gas (TDG) standards. Increasing these standards will allow for more water to be spilled over dams on the lower Columbia and Snake rivers. The most recent, best available science suggests that increasing spill over these dams will help boost survival rates of salmon runs that highly endangered southern resident orcas rely on. The flexible spill agreement reached between Oregon, Washington, the Nez Perce Tribe, and Bonneville Power Administration (BPA) is a positive step forward that will help restore endangered salmon and orcas. However, Defenders of Wildlife (Defenders) disagree with Ecology's decision to only raise TDG standards to 120% during the 2019 spring migration.

Defenders is a national non-profit conservation organization with over 1.8 million members and supporters nationwide, including more than 24,000 members and supporters in Washington state. Founded in 1947, Defenders is a science-based advocacy organization focused on conserving and restoring native species and the habitat upon which they depend. We have a long history of contributing to agency-led recovery for endangered species. This past year, our staff participated in the Orca Task Force's Prey Work Group, which helped develop the recommendation to increase the state's TDG standards. We have also worked with schools, cities, counties, and state agencies on programs to reduce toxic pollution throughout the Salish Sea, helping to recover orcas and the salmon they depend on.

Increasing spill on the lower Columbia and Snake Rivers is a critically important near-term action to make more salmon available to starving orcas. The evidence presented in the EIS suggests that 125% TDG is a safe and reasonable standard. Increasing TDG standards to this level gives the state more flexibility to adjust spill levels with partners as necessary. Because southern resident orcas face an immediate threat of extinction, **Defenders strongly supports alternative 3 to increase the state's TDG standards to 125%.**

Southern resident orcas cannot wait

Southern resident orcas are among the most endangered marine mammals in the world. With only 75 individuals remaining, the population is the lowest it has been in over three decades. The collapse of chinook salmon, the orcas' primary prey, throughout the Northwest have led to the whales starving to death. Pollution from our cities contaminate the few salmon that remain, which can make orcas (particularly calves) sick. And with ever-increasing vessel traffic through the Salish Sea, underwater noise disrupts the orcas' ability to hunt and communication with each other. Without abundant, healthy, and accessible salmon, these orcas may go extinct in a few decades.

Perhaps the greatest change in the orcas' diet has occurred in the Columbia Basin. Prior to European colonization, the Columbia Basin supported millions of salmon, half of which were from the Snake River, providing orcas with a critical source of food. After these rivers were dammed, salmon runs throughout the basin collapsed. Despite billions of dollars invested in recovery, none of these salmon runs have recovered, further jeopardizing orcas. Increasing spill over the lower Snake and lower Columbia dams would benefit seven of the fifteen most important salmon runs in the orcas' current diet (NOAA and WDFW, 2018). The EIS does not explicitly mention the historical and current importance of the Columbia Basin to southern resident orcas, and we suggest this be added to the section on page 8 titled "Importance."

Recovering southern resident orcas will require multiple actions across the orcas' range. The Fish Passage Center estimates that spilling up to 125% TDG for 24 hours a day would result in roughly 146,000 more adult salmon returning to the Columbia Basin every year. There are few other actions that would result in this many salmon within just a few years. In the EIS, the department acknowledges that increasing spill to 120% "would slightly benefit salmon relative to the 2018 injunction operations" (page 22). A slight benefit will not address the urgent nutritional needs of southern resident orcas. Because of this, **we strongly urge Ecology to demonstrate bold leadership by increasing TDG standards to 125%.**

The most recent, best available science supports increasing TDG standards to 125%

The majority of studies cited in the EIS suggest that spill up to 125% is safe for most native aquatic species, particularly salmonids, despite concerns that increasing TDG and prolonged exposure to saturated water will cause Gas Bubble Trauma (GBT). The studies in the EIS that noted concerns with TDG levels and exposure used net pens and surface cages, preventing salmon from moving to lower TDG areas of the river (i.e. further downstream or deeper in the river channel). The EIS, though, notes that "water depths in the Snake and Columbia rivers broadly provide adequate depth to circumvent TDG related impacts" (page 50) and that salmon can recover from the impacts of GBT after several hours in areas with lower TDG.

It is also worth noting that that vast majority of the studies cited in the section titled "Potential for Negative Impacts of Total Dissolved Gas" are from the 1990s or earlier. The scientific community's understanding of spill and TDG has significantly advanced in the last two decades. The most recent, best, available science supports efforts to increase TDG standards to 125%. These older studies do not provide a holistic analysis of the impact of increased spill and TDG on salmonids.

While there have been more recent studies demonstrating the benefits of spill, the EIS only contains a brief explanation of the models used by the Comparative Survival Study (CSS) and the National

Oceanic and Atmospheric Administration (NOAA) to assess the impacts of spill. Ecology did not cite any other studies in the section titled “Potential Positive Impacts of Increased Spill” despite multiple scientific articles that support increasing spill. Williams (2006) documents multiple studies of how restoring natural processes in rivers, such as increasing flow rates via increased spill, aids in salmon restoration. Other recent studies have shown that management of freshwater systems, such as increasing spill, can affect smolt-to-adult returns, even when taking ocean conditions into account (Schaller et al., 2013; Petrosky and Schaller, 2010; Schaller and Petrosky, 2007; Haesecker et al., 2012). Salmon in the Columbia Basin evolved in a system that included higher levels of TDG. The EIS should also acknowledge that prior to the damming of the Snake and Columbia rivers, a network of rapids and waterfalls in the region naturally increased TDG in the rivers.

The EIS also fails to acknowledge the substantial mortality caused by the hydropower network in the Columbia Basin. Without spill, smolts are sent through dam turbines and/or elaborate bypass systems. Dams and their reservoirs kill as much as 70 percent of the out-migrating smolts and more than 15 percent of the returning adults. Some smolts die further downstream as a result of cumulative stress and injury (CSS, 2018). Dams have also reduced water velocity, increased water temperatures, exacerbated predation, prolonged salmon migration, and increased salmon mortality and injury during dam passage (Budy et al., 2002; Scheuerell et al., 2009; Van Gaest et al., 2001). Because the EIS does not include this holistic analysis of salmon survivability in the Columbia Basin, it implies that any mortality attributable to increased spill would be additive. A more thorough analysis should examine the ability of increased spill to decrease other sources of mortality, primarily by increasing the travel time for juvenile salmon to reach the ocean. This reduces the amount of time juveniles spend in potentially lethally hot reservoir water, which is also where they are vulnerable to predation. As written, the EIS presents only one, dated, side of the science around spill.

Impacts to non-native fish species would further benefit salmon

On page 29, the EIS begins discussing the potential impacts of increased spill on non-salmonids. As the EIS stated, there are no studies indicating that 125% TDG impacts invertebrates or native amphibians. According to the most recent data, only non-native species, several of which predate on juvenile salmon, would be impacted by increased TDG. The EIS cites several studies that increased spill would negatively impact northern pikeminnow, largemouth bass, and smallmouth bass. These three species are non-native predators of chinook salmon and other salmonids, and the state is actively encouraging efforts to reduce populations of these fish. While increased TDG is expected to negatively impact these species, this would further benefit the state’s goal of recovering salmon and orcas. The EIS should acknowledge this potential benefit. The majority of the other species that would be negatively impacted by increased TDG are also non-native.

An additional EIS this summer is redundant and unnecessary

Ecology has stated that it plans to undergo an additional public process this summer to increase TDG standards to 125%. This second public process would be redundant and result in unnecessary delay – to the detriment of both salmon and orcas. The data available to inform this decision will not substantially change (if it changes at all) before this summer. The department has offered no justification for why it believes a second EIS is necessary.

Raising TDG standards to 125% gives Ecology discretion and flexibility when working with partners, like Bonneville Power Administration, to set appropriate spill levels. Increasing TDG standards to 125% does not require Ecology or dam operators to spill up to that level. These standards represent a regulator ceiling, not a floor. By increasing TDG standards to 125%, Ecology can still honor the flexible spill agreement and only spill up to 120% in 2019. In fact, on the four lower Columbia dams, spill would be limited by Oregon's TDG standard of 120%. Currently, Washington's more conservative TDG standards limit spill at these four dams. While spilling up to 125% TDG would maximize benefits to southern resident orcas, dams could spill less than that in 2019. These standards represent a regulatory ceiling, not a floor.

Conclusion

We greatly appreciate your efforts to recover both salmon and orcas by increasing spill on the lower Snake and Columbia Rivers. We strongly encourage the department to choose alternative 3 and increase the state's TDG standards to 125%. This would allow spill up to this level at the four lower Snake River dams, which are solely limited by Washington's water quality standards, in 2019. Oregon's lower TDG standards would keep spill to 120% TDG on the four lower Columbia River for 2019. Defenders and our allies are continuing to work with Oregon to increasing their standards to 125% TDG as well. In the meantime, **Washington can show bold leadership and provide immediate relief to southern resident orcas by increasing our standards to 125% TDG.**

We look forward to working with you and your staff further to prevent the extinction of orcas and salmon.

Sincerely,



Robb Krehbiel
Northwest Representative
Defenders of Wildlife

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Dear Director Bellon,

Southern resident orcas are one of the most endangered marine mammals in the world. The salmon runs these whales once relied on, particularly those in the Columbia basin, are a shadow of what they once were, leaving these whales with less food. Columbia and Snake river salmon were once the largest and most abundant on the west coast, providing southern residents with a critical winter food source when there are few other salmon available.

The decline of salmon across the northwest is complex, but perhaps the most significant change to salmon habitat has been the damming of rivers. Dams slow adult and juvenile salmon migration, making them increasingly susceptible to predation and lethally warm water. Large reservoirs on the Columbia and Snake rivers make it increasingly difficult for young salmon to quickly and safely migrate to the ocean where they can mature.

A short-term step to alleviate at least part of this problem is to increase the amount of water spilled over dams in the Columbia Basin. Decades of scientific research and observation has shown that spill is the safest way for juveniles to migrate to the ocean and that higher levels of spill result in more adults returning to the mouth of the Columbia. For years, Washington's total dissolved gas (TDG) standards, which limit the amount of water that can be spilled, have been overly conservative. The best available science suggests that eliminating the 115% forebay TDG standard as you propose and immediately increasing the tailrace TDG standards to 125% will maximize the benefits of spill without negatively impacting other species or the environment. Spilling up to this level is estimated to result in 146,000 more adult salmon, making spill one of the most effective near-term actions the state can take to provide more food for orcas.

Your department has proposed increasing tailrace TDG standards to only 120% for this spring's out-migration. While this increase may help in a small way, there is no reason to not raise TDG standards to 125% immediately. Southern resident orcas are starving to death and are unable to find enough food to successfully raise new calves. This situation requires an emergency response. I strongly urge you to increase the state's TDG standards to 125% for the 2019, 2020 and 2021 juvenile out-migration.

Sincerely,

Gill	Fahrenwald	Olympia	WA
Jeffery	McConaughy	Bellingham	WA
Anna	Bechtel	Bothell	WA
James	Terry	TUMWATER	WA
Mike	Conlan	Redmond	WA
Glenn	Eklund	Oak Harbor	WA
Larry	Lawton	Aberdeen	WA
Summer	Spinks	Lynnwood	WA
Stephanie	Picos-Lehman	Tacoma	WA
Diane	Weinstein	Issaquah	WA
Mary	Guard	Friday Harbor	WA
Jennifer	Bentzel	Lacey	WA
Stephanie	Trasoff	Blaine	WA

Deborah	Efron	Bellevue	WA
Tracy	Ouellette	Bow	WA
Maureen	Parriott	Oroville	WA
M.	Lish	Marysville	WA
Nora	Davidson	Silverdale	WA
Diann	MacRae	Bothell	WA
Delorse	Lovelady	Kenmore	WA
Michelle	Pavcovich	Seattle	WA
Toni	Howard	Renton	WA
Kathleen	Medina	Anacortes	WA
Terri	Dumala	Mill Creek	WA
Billie	Mann	Ocean Shores	WA
Carol	Else	Lakewood	WA
Selim	Uzuner	Carnation	WA
Ann	Pryich	Mount Vernon	WA
Donna	Stonecipher	Seattle	WA
Roberta	Hutton-Pieti	Anacortes	WA
Jacob	Meyer	North Bonneville	WA
Beth	Call	Walla Walla	WA
Robert	Vanderkamp	Battle Ground	WA
Leila	Jones	Bothell	WA
Elizabeth	Stoltz	Heisson	WA
Brian	Weatherby	Kent	WA
Derby	Judith	Port Townsend	WA
Marc	Daniel	Mount Vernon	WA
Lyn	Meyerding	Sultan	WA
k	g	Orting	WA
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Peter	Wilsnack	Seattle	WA
Madeleine	Sosin	Seattle	WA
Ranell	Nystrom	Tacoma	WA
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Marilyn	Cochran Mosley	Vashon	WA
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Shreeraj	Defenders	Seattle	WA
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Karine	Werner	Langley	WA
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Carol	Rolf	Colville	WA
Judy	McLain	Oak Harbor	WA
Joann	Riley	Kenmore	WA
Kim	McDonald	Marysville	WA
Suzanne	Hamer	Woodinville	WA
Kyle	Stevenson	Auburn	WA
Linda	Gusch	Spokane	WA
Mary	Riley	Hoquiam	WA
M	Lind	Vancouver	WA
Jean	Jensen	Graham	WA
Randy	Harrison	Eugene	OR
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Lynn	Tucker	Seattle	WA
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Susan	Grzadzielewski	Mount Vernon	WA
Richard	Low	Stanwood	WA
Adina	Parsley	Stanwood	WA
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Julie	Taylor	Terrace	WA
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Richard	Noll	Port Townsend	WA
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Graciela	Rodriguez-Sero	Seattle	WA
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Edward	Brauer	Kent	WA
Barbara	Bonfield	Tacoma	WA
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David	Stetler	Kirkland	WA
Ruth	King	Lacey	WA
Gene	Groom	Orting	WA
Lawrence	Stocks	Lakewood	WA
K.	Youmans	Roslyn	WA
Eric	Fosburgh	Seattle	WA
Mark	Koehnen	Quincy	WA
Shane	Kostka	Spokane	WA
Janice	Kobak	Enumclaw	WA
Kathryn	DeWees	Tacoma	WA
Lyn	Lukich	Spokane	WA
John	Bayer	Washougal	WA
Emily	Austin	West Richland	WA
Suzanne	Steel	Blaine	WA
Brookie	Judge	Seattle	WA
Patty	Bowen	Bellevue	WA
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laurie	geller	camas	WA
Kathy	Ruhl	Tacoma	WA
Denise	Beard	Seattle	WA
Debbi	Pratt	Seattle	WA
Julanne	Nowak	Bellingham	WA
Rhonda	Sigman	Hoquiam	WA
Warren	Weissman	Seattle	WA
Marsha	Adams	Shelton	WA
Tina	Stewart	Woodinville	WA
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Kristin	Gearin	Seattle	WA
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Lori	Greenfield	Mukilteo	WA
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David	Randall	Spokane	WA
Jerry	Kessinger	Lynnwood	WA
Tom	Swoffer	Ravensdale	WA
Julie	Woodman	Seattle	WA
Linda	Seaman	Winthrop	WA
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Barbara	Wallesz	Bellingham	WA
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Tika	Bordelon	Seattle	WA
William	Conger	Anacortes	WA
Norman	Husser	Seattle	WA
Brenda	Bailey	Eastsound	WA
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Kathryn	Ryan	Edmonds	WA
Don	Thomsen	Spokane	WA
Nick	Barcott	Lynnwood	WA
Deborah	Cruz	Ferndale	WA
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Cathy	Lindsay	Seattle	WA
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Roger	Schmidt	Spokane	WA
Lyle	Collins	Yakima	WA
Deborah	Gandolfo	Kirkland	WA
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Norm	Conrad	Mount Vernon	WA
Ray	Couture	Seattle	WA
Esmeralda	Espinaco	Redmond	WA
Stephanie	Almskaar	Everson	WA

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Anna	Liljegren	Kenmore	WA
Steven	Bouchard	Port Townsend	WA
Jan	Luxton	Bremerton	WA
Susan	Burnett	Seattle	WA
John	Lundquist	Auburn	WA
John	Woodworth	Newman Lake	WA
Kelly	Keefer	University Place	WA
Dave	Fairburn	Lakewood	WA
Ron	Sheriff	Bremerton	WA
Rosemary	Perisich	Seattle	WA
Kassie	Wheeler	Deer Park	WA
Nancy	White	Spokane Valley	WA
madelaine	moir	Sequim	WA
Anita	Woodruff	Seattle	WA
Susan	Matteson	Bainbridge Island	WA
Rebecca	Lee	Anacortes	WA
Laura	Hassin	Mercer Island	WA
Paula	Shafransky	Sedro Woolley	WA
Eric	Zimdars	Mill Creek	WA
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Dennis	Marceron	Seattle	WA
C.	Weil	Gig Harbor	WA
Chad	Evans	Seattle	WA
Michelle	Michaels-Tyner	Ridgefield	WA
Sue	Jarrard	Castle Rock	WA
Terry	Parkhurst	Seattle	WA
Melissa	Rees	Spokane	WA
Brenda	Dewey	Coupeville	WA
Helen	Carrick	Sequim	WA
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Leonard	Hearne	Bellingham	WA
Nancy	DeBusman	Carlsborg	WA
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Donald	Stobbe	Sultan	WA
Gary	Larson	Sequim	WA
C	Martin	Pt Roberts	WA

Magdalene	Bumford	Olympia	WA
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Bianca	Reich	Lynnwood	WA
Asphodel	Denning	Mercer Island	WA
Lynn	Offutt	Everett	WA
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Holger	Mathews	Seattle	WA
Richard	ess	Shoreline	WA
Tara	Leigh	Federal Way	WA
Marie	Weis	Fox Island	WA
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Wendy	Pum	Spanaway	WA
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Caroline	Garland	Anacortes	WA
Jack	Stansfield	Stanwood	WA
Mark	Bradley	Sequim	WA
Judith	Cohen	Seattle	WA
Doug	Swansaon	White Salmon	WA
Joe	Wiederhold	Bellingham	WA
Joe	Piecuch	Suquamish	WA
Ken	Mincin	Redmond	WA
Heather	Haverfield	Langley	WA
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Pamela	Larsen	Camano Island	WA
Chris	Thoma	Spokane	WA
Carolyn	Vaughan	Issaquah	WA
Theresa	Jordan	Pullman	WA
Christina	Frutiger	Gig Harbor	WA
JacqueLyn	Lobelle	Vancouver	WA
Andrew	Barker	Manzanita	OR
Serena	McCullough	Yakima	WA
Grace	Padelford	Kirkland	WA
Dagmar	Fabian	Bellingham	WA
James	Mulcare	Clarkston	WA
Lynette	Ching	Seattle	WA
Gary	Brill	Seattle	WA
Laura	Zerr	Auburn	WA
Mike	Schuster	DEMING	WA
Thomas	Libbey	Seattle	WA
Silvia	De Los Santos	Seabeck	WA
Judith	Swanson	Marysville	WA

Carol	Whitehurst	Tacoma	WA
Jim	Ferrier	Ilwaco	WA
Sara	Dubois	Centralia	WA
Stephen	Buck	Richland	WA
Diana	Covington	Tacoma	WA
Kevin	Hughes	Anacortes	WA
Joanne	Beeson	Blaine	WA
Kate	Ionina	Redmond	WA
Dorothy	Jordan	Lynden	WA
Rick	Taylor	Everett	WA
Vonda	Wolcott	Bellevue	WA
Theressa	Carey	Birch Bay	WA
M	Ransom	Woodinville	WA
Melissa	Eriksen	Seattle	WA
Mark	Hughes	Seattle	WA
Matthew	Boguske	Redmond	WA
Cynthia	Humphrey-hart	Oak Harbor	WA
Catherine	Ross	Edmonds	WA
LeeAnn	Chastain	Eastsound	WA
Kathleen	Lee	Lacey	WA
Patti	Harter	Ephrata	WA
Elizabeth	Lengel	Anacortes	WA
Rebecca	Canright	Rockport	WA
Rosanne	Anderson	Cheney	WA
Kathleen	Furness	Duvall	WA
Andrea	Gruszecki	Renton	WA
Stephen	Bailey	Deming	WA
Suzanne	Wittmann	Seattle	WA
Nicole	Marble	Seattle	WA
Lisa	Agard	Mount Vernon	WA
Shawn	Tuthill	Bothell	WA
Malcolm	Booth	Bellingham	WA
Louise	Hubben Batten	Olympia	WA
Anthony	Anderson	Ashford	WA
Rebekah	Baldwin	Puyallup	WA
Joan	Bowers	Seattle	WA
Bruce	Roberts	Stanwood	WA
David	Hand	Bainbridge Island	WA
Paul	Potts	Raymond	WA
Stacia	Haley	Seattle	WA
Michael	Hill	Mineral	WA
T J	Thompson	Gig Harbor	WA
Ruth	Falcon	Seattle	WA

Eugenia	Patterson	Poulsbo	WA
Angie	Dixon	Seattle	WA
Richard	Morgan	Bellingham	WA
Vanassa	Lundheim	Everett	WA
Annette	F	Arlington	WA
Dave	Roehm	Ocean Park	WA
Sue	Stoeckel	Everett	WA
Lyssa	Mercier	Seattle	WA
Gail	Wagner	Vancouver	WA
Robert	Rice	Redmond	WA
Nick	Szumlas	Seabeck	WA
Sandra	Rodgers	Amboy	WA
Sanja	Futterman	Seattle	WA
Sandra	Gehri-Bergman	Puyallup	WA
Crystal	Schaffer	Lacey	WA
Anna	Gullickson	Cashmere	WA
Travis	Miller	Seattle	WA
Lauren	Baker	Richland	WA
Johanna	Daggett	Longview	WA
Tracy	Hartung	Vancouver	WA
Ursula	Mass	La Conner	WA
Jill	Nunez	Buckley	WA
Ky	Parker	Poulsbo	WA
Michael	Blue	Ellensburg	WA
Christopher	Lawrence	Spokane	WA
Karen	Popoff	Omak	WA
Nadine	Wallace	Tacoma	WA
Mary	Cooke	Seattle	WA
Lawrence	Magliola	Sequim	WA
Alisha	Leviten	Shoreline	WA
John	Elliott	Bremerton	WA
Steve	H	Lakewood	WA
Madalyn	Meyer	Renton	WA
Michael	Manoff	Hoodsport	WA
Tamara	Saarinen	gig harbor	WA
Sharon	McKenzie	Port Townsend	WA
Tristen	Wuori	Kent	WA
Dean	Howe	Bonney Lake	WA
Glen	Anderson	Lacey	WA
Erik	Larue	Burlington	WA
Robin	Dein	Seattle	WA
Sean	O'Dell	Renton	WA
Suzanne	Paterson	Issaquah	WA

Lou	Maxwell	Lynnwood	WA
Julie	Whitacre	Bellingham	WA
Christopher	Flynn	Seattle	WA
Fayette	Krause	Port Townsend	WA
Diane	Falk	Everett	WA
Richard	Johnson	Bellingham	WA
Jeff	Freels	Lacey	WA
Kevin	Chiu	Seattle	WA
Dennis	Bahr	Snohomish	WA
Noah	Ehler	Monroe	WA
Kaija	Jones	Vashon	WA
Faye	Bartlett	Bellingham	WA
Linda	Chung	Bellevue	WA
michelle	troster	Battle Ground	WA
Mary	Emmons	Leavenworth	WA
Kimberly	Teraberry	Seattle	WA
ron	wike	marysville	WA
Melissa	Clayman	Kirkland	WA
Richard	Yust	Arlington	WA
Steven	Shapiro	Seattle	WA
Jim	Adsley	Langley	WA
Brenna	Berquam	Bainbridge Island	WA
McCree	Williams	Seattle	WA
Saralyn	Montgomery	Moxee	WA
Andrea	Helman	Seattle	WA
Don	Johnson	Sedro Woolley	WA
Paul	von Szalay	Mill Creek	WA
katie	austin	Monroe	WA
Kathryn	Jacobs	Chelan	WA
Erinn	Carey	Gig Harbor	WA
Christina	Kisskeys	Bellingham	WA
Tamela	Roberson	Everett	WA
Maria	Kjaerulff	Gig Harbor	WA
Farnoush	Katouzian	Tacoma	WA
Diane	Edwards	Anacortes	WA
Jeanene	Lorey	Bothell	WA
Vianna	Engel	Rochester	WA
Sonia	Cantu	Seattle	WA
Dan	Schneider	Seattle	WA
Susan	Hampel	Eastsound	WA
sarah	shields	SEATTLE	WA
Molly	Sutor	Spokane	WA
William	Insley	Tacoma	WA

William	Jarcho	Vashon	WA
Greg	Onsel	Arlington	WA
Christina	McCluskey	Kent	WA
Kim	Seater	Seattle	WA
Perry	Wong	Kent	WA
Sabrina	Murphy	Arlington	WA
Dr. Michael	Berres	Bellingham	WA
Nancy	Wilson	OLYMPIA	WA
Margie	Meis	Everett	WA
Bill	Shanks	Seattle	WA
Fiona	Segretti	Port Orchard	WA
Doreen	Alexander	Marysville	WA
Susan	Kane	East Wenatchee	WA
Karen	Berntsen	Poulsbo	WA
Laurie	Manning	Renton	WA
Gerry	Stamper	Clarkston	WA
David	Rishel	Greenbank	WA
Shelly	Ackerman	Langley	WA
Shelley	Blaine	Everett	WA
Daibra	Duncan	Elk	WA
John	Mcgill	Sequim	WA
Ben	Rall	Spokane	WA
Randi	Eicher	Seattle	WA
Debra	Knutson	Sequim	WA
Wylie	Bryant	Friday Harbor	WA
SusanJ	Sheldrake	Bellevue	WA
K	Penn	Clinton	WA
Laura	Sagen-Hughes	Bothell	WA
Clayton	Jones	Tukwila	WA
Monika	Holm	Seattle	WA
Michael	Rooth	Spokane	WA
Jennie	Blake	Orting	WA
Linda	Ward	Bellingham	WA
Patrick	Conn	Kent	WA
Della	Nestlebush	Ferndale	WA
Margaret	Wettergreen	Bellingham	WA
Debbie	Nelson	Duvall	WA
Bryana	Walters	Snohomish	WA
Lisa	Gaspard	La Conner	WA
Tracy	Mosier	Kelso	WA
Bonnie	Lawlor	North Bend	WA
Judy	Brennan	Bellevue	WA
Vicki	Thomas	Bellingham	WA

Glenna	Johnson	Redmond	WA
Eiko	McDonald	Lakewood	WA
Claudia Lee	Miller	Oroville	WA
Mary	Easton	Cosmopolis	WA
Joseph	Pinc	Vancouver	WA
Suong	Huynh	Kirkland	WA
Gail	Dominick	Montesano	WA
Terri	Stromberg	Redmond	WA
Joanna	Stiehl	Olympia	WA
jean	ferrier	Bellingham	WA
Barb	Nichols	Freeland	WA
Roger	Schmidt	Spokane	WA
Catherine	Pierce	Poulsbo	WA
V	Mangum	Spokane Valley	WA
David	Benson	Pullman	WA
Nadine	Cotter	Chehalis	WA
Patricia	Wilson	Belfair	WA
Derek	Benedict	Lynnwood	WA
Donna	Glaser	Dupont	WA
Dianne	Hurst	Lacey	WA
Robert	Curry	Cheney	WA
Arlene	Olson	Olympia	WA
Joy	Gohl	White Salmon	WA
Alex	Berger	Seattle	WA
Ernest	Bellavita	Ferndale	WA
Rita	Carrowwawa	Sequim	WA
Mary jo	Wilkins	Kennewick	WA
Robert	Jacobs	Vancouver	WA
Melinda	Burks	Seattle	WA
Kristi	Hunziker	Yakima	WA
Edith	Gish	Tacoma	WA
Stacy	Starr	Port Orchard	WA
Nicholas	Kovalcik	Newcastle	WA
Taylor	Jackson	Everett	WA
Lesley	Miles	Blaine	WA
Michael & Judi	Hoffman	Kirkland	WA
Karen	Fortier	Monroe	WA
Betsy	Pendergast	Port Townsend	WA
William	Weathersby	Olympia	WA
Jessica	Perez	Redmond	WA
Annie	Rein-Weston	Seattle	WA
Barbara	Rosenkotter	Deer Harbor	WA

Joy	Gardner	Edmonds	WA
Taggart	Howland	Vancouver	WA
Jonathan	Wuori	Kent	WA
Ellen	Ward	Seattle	WA
Jc	Vescio	Bonney Lake	WA
Brenda	Seifert	YAKIMA	WA
Kjirsten	Collier	Renton	WA
erik	johnson	Belfair	WA
Carolyn	Eden	Bainbridge Island	WA
Jan	Weisel	Woodinville	WA
Sherry	Kraft	Seattle	WA
Brett	Kessler	Washington	DC
Marsha	Jollensten	Bothell	WA
Jennifer	Blume	Seattle	WA
Ashley	Holtorf	Blakely	WA
Divya	Rathor	Sammamish	WA
Susan	Evans	Bellingham	WA
Amanda	Cermak	Woodinville	WA
Lynn	Ruelan	Sammamish	WA
Heidi	Mcbride fritts	Edmonds	WA
Jeanne	Turgeon	Seattle	WA
Pat	Stevens	Stanwood	WA
Rosie	Young	Spokane Valley	WA
MaryAnn	Seward	Port Townsend	WA
Cheri	Kunz	Woodinville	WA
John	Maxwell	Port Townsend	WA
Mary	Olheiser	Burien	WA
Marie	Alexander	Ollala	WA
Joan	Peter	Gig Harbor	WA
Julie	Cipale	Olympia	WA
Mieko	Krell	Seattle, WA	WA
Maura	Peterson	Issaquah	WA
Virgene	Link-New	Anacortes	WA
Treena	Millett	Sequim	WA
Janet	Wynne	Bellingham	WA
Renee	Richards	Kirkland	WA
David	Scheer	Bellingham	WA
Michael	Anderson	Olympia	WA
Marcia	Ponto	Shoreline	WA
Rick	Cobos	Tacoma	WA
Jerry	King	Spokane	WA
Karla	Taylor	Olympia	WA
Allison	Ciancibelli	Twisp	WA

Linda	Francis	Olympia	WA
Liz	Nedeff	Renton	WA
Susan	Sargis	Friday Harbor	WA
Colleen	Harpold	Kent	WA