



**CONSERVE, PROTECT AND RESTORE NORTH AMERICA'S
COLDWATER FISHERIES AND THEIR WATERSHEDS**

ATTN: Cheryl Nemi
Department of Ecology
Water Quality Program
PO Box 47600
Olympia, WA 98504

7/10/19

RE: EIS scoping for WAC 173-201A Rulemaking for five discharger variances on the Spokane River

Dear Cheryl Nemi,

I am providing the following comments for the SEPA Scoping Process on variance WAC 173-201A on behalf of Spokane Falls Trout Unlimited. The Spokane Falls Trout Unlimited is a chapter of Trout Unlimited. Our organization works to conserve, protect and restore the Spokane River and its tributaries. We use education, outreach, collaboration and our **600+ members'** collective muscle to make real, tangible progress toward a healthy native fish population in the Spokane River.

Statewide impacts on Washington Waters:

This process allowing approval of discharger variances in the Spokane River Basin will have immediate policy and water quality implications for the future of Washington State surface waters and catchable, edible, "usable" fish populations in our aquatic ecosystems. Discharger variances codified by the new Washington code, will have the effect of providing a "play book" for export of variances to *all* other Washington water bodies listed as impaired on the States 303 (d) list for PCBs..

EIS Study to Address:

The environmental impact study resulting from this scoping process must examine impacts/issues in the Spokane River, but also should include impact studies for all water bodies in Washington State listed as impaired on the States 303 (d) list for PCBs.

EIS studies should include (among others):

Impact on aquatic food webs: Study the effect of exposure to PCB toxins in the Spokane River including on a full range of aquatic plants and animals as well as terrestrial animals connected to these aquatic environments.

Impact on native fish and salmon reintroduction: In what ways does discharging PCBs harm the spawning, rearing and migration of both native trout as well as future salmon and steelhead that may enter the system in the near future.

Downstream impact: Do the Columbia River and estuaries receive PCB burdens from the Spokane River sources? Native redband trout, multiple other native species of fish as well as warm water species of fish sought after by sport fishers occupy downstream waters in the Spokane River (Spokane Arm of the Franklin D. Roosevelt Reservoir) and further to the Columbia River.

Sincerely,

Hilary Hart, *President*, Spokane Falls Trout Unlimited
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