

Patty Gates

Regarding scoping discharger variances:

1. Ecology must consider how a variance will impact the ability to meet the Spokane Tribe's Water Quality Standards (for poly chlorinated biphenyls or PCBs). Ecology cannot take action that will cause or contribute to a violation of the Tribe's standards.

Ecology must explain how a variance will comply with the Federal Court order to develop a clean-up plan called a Total Maximum Daily Load (TMDL) for PCBs.

2. Ecology must address issues of environmental justice -- who is eating fish and how will they be impacted by a decision to weaken the water quality standard for PCBs? Will the variance disproportionately impact Native Americans or other fishing and minority communities?

3. Ecology must assess all technological options to address PCBs.

4. Ecology must assess impacts of PCBs on the entire food web.

5. Ecology must fully assess the effectiveness of issuing pollution permits with compliance schedules to meet the EPA/WA water quality standard.

6. Ecology must assess the social and economic costs of continued toxic pollution shouldered by the community in the form of lost and degraded uses. For example, who does not use the river any longer because of polluted fish and what is that costing us?