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An EIS need include:

- a thorough assessment of how PCB variances will affect the Spokane Tribe PCS water quality standard downstream from Spokane and the legal and environmental issues of that.
- an exploration of how this would negatively influence issues of environmental justice. What minority communities will be disproportionately affected by these standards (i.e. Native American and homeless people who rely heavily on fish for their diets)
- address the impacts this would have on the ENTIRE food web as PCBs are bio-accumulative
- designated river uses that may be lost (thereby violating the CWA) by higher levels of PCBs
- long-term health consequences of not meeting 7ppq for at least 20yrs, as most applications propose.
- determine how variances will comply with the federal court order and requirement under the CWA for EVERY pollutant to have a TMDL.