

William Golding

I am appalled by Washington State Department of Ecology's efforts to weaken water quality requirements and efforts to avoid cleaning up pollution in the Spokane River. This is a direct violation of treaty agreements between the United States and a multitude of Indigenous Nations within present day Washington State. These sovereign nations have reserved rights to access healthy fish throughout the Spokane River and the subsequent Columbia River watershed, in exchange for access to the lands of present-day Washington State. Allowing for avoiding clean up of this polluted waterway violates these treaty rights. This violation, if allowed will carry on a history of violating treaty rights, and is unacceptable. As a resident of Washington State, I am gravely disturbed by these efforts and strongly oppose any efforts to avoid cleaning up degraded water quality across the state.

Please accept the following as my comments for Ecology's scoping process for adopting a variance to lower water quality in the Spokane River.

- (1) What are the impacts of de-listing redband trout as a designated use of the Spokane River, thus degrading and possibly destroying the redband fishery?
- (2) What are the social, economic and ecological impacts of not reducing PCB concentrations in the Spokane River, particularly when summertime flows fall to dangerously low levels due to overpumping and climate change?
- (3) Explain why letting polluters off the hook for cleaning up PCB contamination is more important/valuable than public and ecological use of the Spokane River.
- (4) Explain why, after more than 40 years of knowing about the public health dangers posed by PCBs, the state has never required Spokane River polluters to control the PCB pollution coming out of their pipes, thereby failing to meet the Clean Water Act goals of a fishable, swimmable river.
- (5) Explain why the State of Washington is suing EPA for rolling back standards for PCB pollution elsewhere in Washington, while at the same time proposing to roll back PCB standards for the Spokane River?
- (6) Please make the polluters' applications for variance available to the public before asking for scoping comments, and extend the deadline for scoping comments, to allow the public adequate time to fully understand the issues before being asked to comment.

Thank you for this opportunity to comment on the scoping process to adopt a variance for lowering water quality – a move that threatens the ecological health of the Spokane River. Please keep me informed about further developments related to this proposal.