Joan Broeckling

To whom it may concern: I would like to request an extended scoping period for the EIS impacting discharge variances for the Spokane River. The health of our river is at stake. The urgent need to protect the health of our waterways supercedes any

"needs" of polluting industries, and a thorough EIS must be completed, to include the following:

Ecology needs to consider how a variance will impact the ability to meet the Spokane Tribe's Water Quality Standards (for poly chlorinated biphenyls or PCBs). Tribal rights have been run roughshod for too many generations! Ecology cannot take action that will cause or contribute to a violation of the Tribe's standards.

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/ low income/ minority communities?

Ecology must assess all technological options to address PCBs.

Ecology must assess impacts of PCBs on the entire food web. It's not just about fish.

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

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.

The Spokane River is already adversely impacted by upstream mining pollution, which limits our current ability to use the river for recreational and food resources. Rather than making it worse, we need to be working toward creating a CLEANER river. Ecology must assess the social and economic costs of continued toxic pollution shouldered by the community in the form of lost and degraded uses. What is pollution already costing us beyond straight monetary issues?

Thank you for your time and consideration of these issues.