

Lincoln Loehr

On page 31 the agreement says that EPA and DOE will work on developing a CAP for PCBs. I note that one has already been developed, so maybe this line needs to be changed, or, if this is referring to updating or changing the CAP, it should so state.

Pages 33-34 talk about the nutrient actions. Perhaps it should note that it is driven by 51 year old water quality standards that have no technical basis, and make no sense. Or, at least acknowledge that there is some controversy over the use of the DO standards as water quality targets, and that this could be changed in the coming year. Note for example, the nutrient reduction program in the Chesapeake Bay realized that the existing DO standards were not attainable or functional, and that EPA stepped in and developed scientifically based DO standards that covered different types of waters, different seasons, different depths, and varying averaging periods. Washington's standards bear no resemblance, and have no documented technical basis, and impose requirements of little or no biological benefit.