

Spokane Riverkeeper

Dear Lara Henderson, TMDL Program Planner:

I would like to provide the following comments on behalf of the Spokane Riverkeeper in Spokane Washington. We are advocates for the rivers and waterways of the Spokane River Basin as well as advocates for the public uses and enjoyment of those waterways.

Our comments are in regards to two waterways in the Spokane River Basin that we believe require Total Maximum Daily Loads (TMDL) for pollutants that currently impair the public uses of those waterways, and are damaging the aquatic life that they support.

1) We ask that the Washington Department of Ecology (WDOE) develop a TMDL for polychlorinated biphenyl's (PCBs) for the Spokane River in WRIA 54 and WRIA 57. Numerous segments of the Spokane River are on the 303d list for PCB pollution and require attention and action. Currently, the Spokane River lacks an approved loading limits (Waste Load Allocations and Load Allocations) for PCBs. Because of this deficiency, the work plans and actions developed to address pollution from controllable sources lack accountability and coherence under the Clean Water Act. The Spokane River Regional Toxics Task Force (SRRTTF) is not an adequate substitute for a proper TMDL as it lacks the final loading allocations and legal limits. However, the SRRTTF does provide a foundation and numerous pieces of scientific analysis with regards to the loading and sources of PCB pollution, and therefore the SRRTTF could provide substantive additions in the development of a TMDL.

2) We ask that the WDOE develop a TMDL for dissolved oxygen (DO) for Hangman Creek in WRIA 56. This creek is impaired for multiple parameters that degrade its capacity to carry and deliver enough oxygen to keep it a healthy waterway. Additionally, Hangman Creek is a primary contributor of pollutants to the Spokane River which is currently suffering from DO impairments. A TMDL for DO on Hangman Creek would allow for the development of Waste Load Allocations that aid in facilities planning for point-sources as they endeavor to upgrade waste water treatment plants that damage both Hangman Creek and the Spokane River.

We hope you will consider the enormous benefit that the development of TMDLs would bring to reducing pollution in the Spokane River Basin. We appreciate the opportunity to comment for the benefit of our waterways and the public that uses and enjoys them.

Respectfully,

Jerry White, Jr.
Spokane Riverkeeper