



To: Curtis Johnson, WA Dept. of Ecology, Eastern Regional Office
Via Email

From: P. Brent Nichols, Ph.D.
Division Director

Date: November 4, 2020

RE: 2020 draft of the Little Spokane DO, pH, TP, TMDL

The Spokane Tribe of Indians' Division of Fisheries & Water Resources appreciates the opportunity to comment on the Department of Ecology's draft TMDL for dissolved oxygen, pH, and total phosphorous in the Little Spokane River. The health of the Little Spokane is of utmost importance to the Tribe. For millennia salmon, steelhead, and lamprey returning to the Spokane River watershed supported the Tribe nutritionally, spiritually, culturally, and economically. As these anadromous species are being reintroduced to the region the Tribe is actively preparing our waters for their return.

Ecology has put significant resources and effort into the analysis and recommendations presented within the TMDL. Generally, we approve of the analyses that have been performed within the past decade and agree with many of the types of impairments identified. We are very encouraged by the recommendations made within the document as well, especially the practices emphasizing riparian buffers and instream restoration. The best management practices and implementation plan within the TMDL will be a useful resource to assist with the Tribe's restoration efforts. However, this is not the first time such actions have been promoted in the Little Spokane by Ecology.

The recommendations made within the current TMDL are similar to the 2012 TMDL developed for Fecal coliform, temperature, and turbidity in the Little Spokane River. We are concerned by the lack progress made since the 2012 TMDL and how few restoration projects were implemented in the watershed. It is not clear why or how the 2012 implementation strategy fell short. However, we hope that it was a learning opportunity for Ecology and that lessons learned will be applied to implementing the 2020 plan presently under review. We encourage Ecology to hire a consultant to develop a comprehensive outreach strategy the agency can use to foster positive relationships with private landowners, agricultural interests, and the forestry community.

The Spokane Tribe historically fished anadromous and resident species within the Little Spokane River watershed. We value that Ecology is protecting this watershed for current and future use of these culturally important resources by initiating the DO, pH and total phosphorus TMDL. Improving water quality in the Little Spokane River watershed will be a challenge,



however, after review of the 2020 TMDL, participating in the public webinar, and following conversations with Ecology staff, F&WR is encouraged by Ecology's efforts.

The Spokane Tribe of Indians highly recommends the following regarding the Little Spokane River TMDL's to Ecology:

1. ***Incorporate recommendations within the TMDL that will improve the Little Spokane watershed for future reintroductions of anadromous species that were historically abundant, rather than set objectives that are less stringent and only focus on resident species.*** Using these recommendations set within the 2020 and the 2012 TMDLs, the Spokane Tribe can coordinate with Ecology and others to protect and restore the Little Spokane watershed for current and future use.
2. ***Incorporate recommendations within the TMDL for Polychlorinated Biphenyls (PCB) contaminants.*** The recent reports of PCB in Deadman Creek and the EPA cleanup of the former Kaiser smelter site in Mead points to the need for the inclusion of PCB's in the TMDL recommendations for the Little Spokane River.

Please reach out to me with any questions or coordination needs.

Lemlmt (Thank You),

A handwritten signature in blue ink, appearing to read "P. Brent Nichols".

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P. Brent Nichols, Ph.D., Division Director
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