



SPOKANE  
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April 18, 2025

*VIA Online Comment Form*

Marla Koberstein  
Department of Ecology, Water Quality Program  
PO Box 47600  
Olympia, WA 98504-7600

Dear Water Quality Standards Team:

Thank you for the opportunity to comment on the 2025 Triennial Review Draft Work plan. Spokane Riverkeeper is a non-profit, advocacy organization that works to protect the Spokane River Watershed. The mission of the organization is to protect and restore the health of the Spokane River watershed. On behalf of Spokane Riverkeeper we submit the following comments for your consideration.

### **General Comments**

This plan should include measures to assess and address impacts from 6PPD and 6PPD-quinone due to its significant and well-documented toxic effects on aquatic life, particularly salmon and other sensitive fish species. As a widely used chemical in vehicle tires, 6PPD degrades into 6PPD-quinone, a contaminant that enters waterways through stormwater runoff. Scientific research has linked this compound to acute mortality in coho salmon and other species critical to the health of our ecosystems and Tribal cultural resources. The importance of data collection of 6PPD and 6PPD-q cannot be overstated. The ubiquity of tires, and their use of 6PPD, leaves no watershed or community unimpacted by 6PPD and 6PPD-q, however, we are only now beginning to understand the impact of these chemicals. Scientists believe that many species are impacted by 6PPD-q, as it is the second-most toxic chemical for aquatic species ever evaluated.

However, we cannot wait to understand the dangerous effects of 6PPD and 6PPD-q fully, as it is clear action is needed now. Given the state's commitments to protecting designated uses such as aquatic life and supporting Tribal rights, it is essential that 6PPD-quinone be prioritized for assessment under water quality standards, with the goal of developing protective criteria and effective strategies for reducing its presence in Washington's waters.

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509.464.7650 | 35 W. Main Ave Suite 308, Spokane, WA 99201



## **Specific Comments**

### *Priority No. 3 - Lake nutrient criteria*

We appreciate and support Ecology’s ongoing efforts to address nutrient pollution in Washington’s lakes, particularly the work being done to prioritize the development of a lake nutrient criterion. As part of this work, we urge Ecology to ensure that nutrient criteria apply not only to natural lakes but also to reservoirs, consistent with EPA’s recommendations. Reservoirs function as lakes in many respects, serving critical roles in recreation, habitat, and ecosystem health, and they are equally vulnerable to the impacts of nutrient pollution—such as algal blooms, oxygen depletion, and fish kills.

Spokane River watershed in particular urgently needs protective nutrient criteria. Nutrient pollution has already caused significant and recurring water quality problems. Long Lake Reservoir experiences persistent eutrophication and algal blooms, threatening public health, aquatic life, and the usability for recreation. Similarly, in the Hangman Creek Basin excessive nutrient loading has contributed to severe algae overgrowth, degrading water quality and further impairing habitat for fish and other aquatic species (see photo below, from Summer of 2024, where duckweed overgrowth completely overtook Hangman Creek). These issues highlight the need for comprehensive criteria that address both point and nonpoint sources of nutrients.

Washington’s nutrient pollution challenges are not limited to lakes and reservoirs. We encourage Ecology to be proactive in preparing and implementing nutrient criteria for rivers and streams. The current approach is not enough to address the significant issues our waterways face. Excess nutrients contribute to degraded water quality both locally and downstream, exacerbating eutrophication and negatively impacting wildlife. Addressing nutrients across all waterbody types is essential for protecting designated uses, meeting Clean Water Act goals, and ensuring the health of Washington’s waters for future generations. We look forward to supporting Ecology in advancing nutrient criteria that reflect this comprehensive and science-based approach—one that prioritizes

places like the Spokane River and its tributaries where nutrient pollution is already causing well-documented harm.



*Project No 7 - Update aquatic life toxics criteria for PFOA and PFOS*

We support Ecology's ongoing updates to water quality criteria for PFOA and PFOS as an important step in protecting public health and aquatic life from harmful PFAS contamination, and support the adoption of EPA's more stringent criteria. Washington's current criteria are well above the levels understood to be harmful to aquatic and human health, and should be updated. We also urge Ecology to broaden its efforts beyond the EPA's criteria to include the evaluation and development of criteria for additional PFAS chemicals beyond PFOA and PFOS, including PFBS. Given the widespread use, persistence, and toxicity of many other PFAS compounds, a more comprehensive approach is necessary to fully address the risks these substances pose to Washington's waters, fish, and communities.

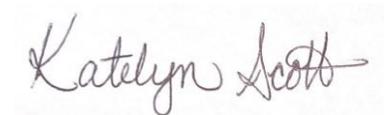
*Priority 8 - Aquatic life toxics criteria for chemical mixtures*

Spokane Riverkeeper strongly supports the development of water quality criteria for chemical mixtures. Our watershed faces the challenge of complex chemical interactions, and it's crucial that regulations evolve to address the complex nature of these chemicals. Incorporating site-specific data and prioritizing this work in future rulemaking will help create enforceable standards that reflect the unique environmental conditions of the Spokane River, offering stronger safeguards for the health of our river ecosystem.

*Priority 9 - Tracking water quality standard developments*

We support Ecology's active participation in the federal process as the EPA updates national water quality standards. It is critical that Washington remains engaged in these discussions to ensure the state's perspective, priorities, and commitment to science-based decision-making are reflected as federal policies evolve. Washington has long been recognized as a national leader in water protection, setting strong, protective standards that can serve as a model for other states and the nation as a whole. We appreciate the state's ongoing efforts to strengthen water quality protections that safeguard the health of our rivers, lakes, and streams, ensuring clean water for communities, fish, and wildlife now and for future generations. As Washington continues to lead in advancing water quality standards, we hope the State will push our nation to do better—adopting more comprehensive, protective, and forward-thinking policies that reflect the urgency of today's water challenges and uphold our shared responsibility to protect clean water for all.

Respectfully submitted,

A handwritten signature in cursive script that reads "Katelyn Scott". The signature is written in dark ink on a light-colored background.

Katelyn Scott, Esq.  
Water Protector