

Washington State Department of Ecology  
Public Hearing  
July 8, 2015  
Moses Lake, Washington

I am Walter "Spike" Arlt the Manager Partner representing the Arlt Family Limited Partnership at this hearing.

The goals and objectives of the Ecology Department and the F&W NPDES permit requirement are in direct conflict whenever Fish and Wildlife implements the NPDES permit special exception.

These are the Primary Ecology 3 Mission Goals listed below from their website. Toxics Clean up and Water Quality along with Water Resources are a part of that.

In order to fulfil its mission and move Washington forward in a global economy, the Washington Dept. of Ecology has three goals:

- Prevent pollution
- Clean up pollution
- Support sustainable communities and natural resources

• TOXICS CLEANUP

Mission: To get and keep contaminants out of the environment.

• WATER QUALITY

Mission: To protect and restore Washington's waters.

• WATER RESOURCES

Mission: To manage water resources to meet the current and future needs of the natural environment and Washington's communities.

A new NPDES permit and the F&W usage of it, are in direct conflict of those items!

The Number 1 Goal of the Fish and Wildlife Department taken from the current website is this:

**Department Goals**

**Goal 1:**

**Conserve and protect native fish and wildlife**

The NPDES permit usage by Fish and Wildlife attempts to kill all native fish and most all large trophy fish. They replace all dead fish first in the early stages with fingerling trout. Later in the stream and lake rehab process, legally catchable sized trout are planted just before the opening day of fishing season. Many of these fish are genetically sterile large trout.

There is no need to kill all the native fish, or the large trophy fish of all species with toxic chemicals and especially in conflict of the number 1 Department Goal.

Fish and Wildlife does not make any rotenone applications in Western Washington. They have not for decades.

They don't need to make any rotenone applications in Eastern Washington either.

No Westside Applications . . . Why?

Only Eastside Applications . . . Why?

Is there a political discrimination of toxic pollution between the Westside and Eastside of the state?

Will a new NPDES Permit be just an edit of the old one? Will the rotenone powdered and liquid mixtures be tested for inert ingredients before applications are made? Will all toxic chemicals be identified as to pollutant discharge before applications are made?

Will domestic wells (adjacent to streams and lakes) be tested before and after rotenone applications for toxic chemicals?

"Washington's water quality statutes and regulations do not allow the discharge of pollutants to water of the state without permit coverage." Why don't we just edit out the last 3 words?

We, The Arlt Family Limited Partnership, have been property owners on Park Lake (Sun Lakes) since 1968 and have experienced the Historical Aquatic Horrors of Stream and Lake Rehabilitation by the State of Washington Fish and Wildlife Department. There have been several applications since we acquired the Park Lake property.

Park lake historically has received this F&W Rotenone rehab program 9 times now.

The Arlt Family Limited Partnership filed an appeal to stop the rotenone application to the POLLUTION CONTROL HEARINGS BOARD FOR THE STATE OF WASHINGTON. The relevant permit then was the NPDES Permit.

In the appeal, we documented potential harm to our personal property and potential harm to members of the Arlt Family Limited Partnership with toxic chemicals and dead fish contamination to the lake, shoreline, property and domestic well.

A 13 page document was filed and dated November 6, 2006 for 2002 NPDES permit termination action to the POLLUTION CONTROL HEARING BOARD FOR THE STATE OF WASHINGTON before application of

powdered and liquid rotenone was applied to Park Lake in 2006. Documented facts support the appeal for termination of the NPDES permit.

After the Rotenone application to Park Lake by Fish and Wildlife, these potential harmful concerns became a reality.

On July 18th, 2008 members of the AFLP and a local concerned citizen met with Jeff Korth in the Ephrata, Washington F&W office to discuss the continued uses of rotenone mixture applications in lakes and streams in Eastern Washington.

Following that meeting on August 18th, a 21 page written document titled, "Aquatic Horror" was submitted to Fish and Wildlife requesting termination of the NPDES rotenone applications, due to violations of the permit with radical toxic chemicals.

Major problems still exist with the "Inert Ingredients" in the powdered and liquid rotenone products used in the applications. They are simply unknown while a few have been identified by special testing.

Respectfully yours,

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