Public Comment Form
Spokane River Dissolved Oxygen Water Quality Improvement Plan

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Review the plan online: www.ecy.wa.gov/biblio/0710073.html
For guidance on how to comment: www.ecy.wa.gov/biblio/0410039.html

Please provide your comments below *(you do* **not** *have to use this form, it is only provided for your convenience)*:

11/6/07

With regard to information gained and testimony heard at the two hearings at SCC in October, I am appalled at some of the flaws in the proposed water quality clean-up plan, specifically:

1. The assumption that water entering Washington from Idaho can contain 2 parts dissolved oxygen to which Washington could add an additional 2 parts DO, thus violating the Clean Water Act standards potentially by 100%. Ecology must require EPA to revise its rulings on the quality of water entering the state, or somehow devise a plan to prevent Washington from adding to the TMDL. I don't see how this is possible realistically. Ecology needs to revise its basic data, I believe, considering that Liberty Lake and other sources will inevitably add to the TMDL.

2. By far too little, if any, consideration seems to be evident in this draft TMDL for the concerns and standards of the Spokane Indian Tribe. It is affected most in the area below Long Lake dam to the junction with the Columbia River. I believe the operation of the dam and lake by Avista corporation have been insufficiently addressed. This oversight is perhaps the most serious flaw in the proposed plan.

3. There appear to be two radically different time frames for carrying out the clean-up: Idaho's ten-year period compared to Washington's twenty-year period. The proposed 10-year "benchmark" assessment is far too lenient, especially with the option to lower the standards at that time. Ecology needs to set three or five year goals and a ten-year limit.

(over)

Please submit comments by November 13, 2007
Comments can be mailed to Dave Knight
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or emailed to dkni461@ecy.wa.gov.

for completion. From what I've heard, the technology does exist, albeit expensively. I believe that it is better to address problems <u>now</u> than to procrastinate. As I understand it, a good plan existed in 2004, but has been delayed until now because of the threats by polluters to sue some of its requirements. The present proposal seems to me to be more capitulation to their terms than a reasonable compromise. Therefore, I would request Ecology to come up with a better implementation time-frame with meaningful provisions for enforcement.

4. Finally, as I understand it, the data as assembled, does not adequately address the role of Non-point Sources of pollution, nor take into full account other TMDL/clean-up plans for toxic metals, PCBs, dioxins, etc.

Because I am an ardent canoe paddler and delight in paddling both the "main stem" of the Spokane River and Long Lake, I am deeply concerned over what I see as large flaws in this draft. I've seen at first hand the enormous algal blooms in Long Lake that have made swimming uncomfortable. I want to urge Ecology to remedy the above flaws and others pointed out by the Sierra Club and Friends of the Spokane River <u>before</u> adopting a potentially harmful program.

Thank you for your attention to these comments.

Charles P. Fisk

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