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Bill Bradbury, Chair
Northwest Power and Conservation Council
Submitted online [date]

Re: Comments on the 2014 Draft Columbia River Basin Fish and Wildlife Program Plan

The Spokane River Regional Toxics Task Force (SRRTTF)'s innovative collaborative partnership works towards achieving water quality standards for toxics, specifically PCBs, in the Spokane River. On January 23, 2013 a diverse group of organizations set aside differences and agreed to work towards achieving the water quality standard for PCBs in the Spokane River. A Memorandum of Agreement signed by five water discharge permit holders, three agencies, and three environmental groups established the Spokane River Regional Toxics Task Force (SRRTTF). Public interest in the SRRTTF is high. Approximately 18 organizations representing agencies, industry, and environmental interests attend our monthly meetings. The short term goal: to identify and reduce the inputs of toxics, specifically PCBs, in the Spokane River.

Our comments on the 2014 Draft Columbia River Basin Fish and Wildlife Program Plan (“the 2014 Program Plan”) are provided below.

The SRRTTF thanks the Council for referencing the 2010 Columbia River Basin Toxics Reduction Action Plan in the draft 2014 Program Plan. By acknowledging the need to encourage pollution prevention, implement remedial actions and, specifically, address toxic contaminants, the Council has markedly improved the 2014 Program Plan over the 2009 version. We support many of the Columbia River Basin Toxics Reduction Actions because they are being implemented or are implementable in the Spokane River Subbasin.

The Spokane River is one of the ten major tributaries to the Columbia River and therefore our work directly benefits water quality and fish habitat in the Columbia River Basin -- the only Large Aquatic Ecosystem in the US that does not receive funding for toxics reductions projects. The SRRTTF supports Congressional funding (similar to what is provided to other Large Aquatic Ecosystems) that protects and restores water quality in the Columbia River Basin. The ability to fund the work of the SRRTTF partner members is critical to achieving our goal. For example, funding the implementation of the City of Spokane's Integrated Clean Water Plan is projected to significantly increase removal of PCBs from the Spokane River.

The SRRTTF also supports BPA's recommendation to engage in collaborative partnerships and develop regional toxics-reduction strategies. The SRRTTF has taken the lead in partnering with federal and state agencies and tribes to conduct targeted monitoring for specific, high priority toxic contaminants (PCBs) and to identify hot spots for further action. Our 2014 monitoring program is at the cutting edge in sampling and analysis techniques for ultra-low levels of PCBs.

DRAFT For SRRTTF review and comment 6/18/2014

Public education and outreach is an important aspect of achieving toxics reductions. This includes sharing information on relevant research and technology, best management practices, and toxics management plans. Communication of complex issues with the general public furthers successful implementation these plan. The SRRTTF supports the inclusion of periodic workshops in the 2014 Program Plan.

Thank you for the opportunity to comment.