

August 3, 2016

Public Comment on proposed treatments through the SEPA Process.

Bruce Bolding
Washington Department of Fish and Wildlife
600 Capital Way N
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Dear Sir,

I have reviewed the 2016 Pre-Rehabilitation Plan for the Park and Blue Lake Chain in Grant County, Washington initiated by Chad Jackson (9 pages). This is a premeditated plan used for decades to eradicate all living creatures in surface waters of the State of Washington, primarily for economical gain. If enacted again this fall, it will be the 10th time the Sun Lakes area (Park and Blue Lakes) have been devastated by an "environmental genocide" of Aquatic Horror. The sight of this act by the State of Washington on its own waters is unimaginable, yet here we are again.

Starting in October 2016, tens of thousands of various species of fish, frogs and turtles will be poisoned and die in a gruesome fashion, left to rot and decay on the shorelines of our once pristine lakes. Along with the ecological destruction, the real risk to human health is of even higher concern. Long time residents of Park and Blue Lakes will now be exposed to a mixture of chemicals that are strongly linked to severe health risks for the tenth time. We will prove beyond any doubt, as in the past, that toxic chemicals applied by WDFW will enter domestic wells used daily by local residents as their primary potable water source. These chemicals that will be detected in the wells are known to cause long term and permanent neurological illnesses, primarily Parkinson's disease, Parkinsonism, and atypical parkinsonism. Numerous residents of both Park and Blue Lakes currently suffer from these debilitating neurological disorders, severely shortening their life spans and dramatically decreasing their quality of life. Those who drink these poisonous cocktails of chemicals, or who are exposed to the extreme vapors in the atmosphere that are released by the dissipation of these toxic chemicals, can only look forward to the best of specialized medical treatments.

The application of these toxic chemicals by WDFW personnel is of such concern for human health that specialized Hazmat suits are required to be worn by the applicators. Any property owners or individuals downwind are at extreme danger from the fume hazards that attack the human respiratory system and tissues, yet no precautions or measures are in place for local residents.

I have reviewed the Fisheries Resource Management General Permit or the National Pollutant Discharge Elimination System and State Waste Discharge General Permit, Issuance Date: September 2, 2015 (39 pages).

I was specifically looking for two primary items in this new 42 page permit. I found nothing, absolutely nothing on items number 1 and 2 below in the 2015 NPDES permit.

1. The clean up and burying of all dead fish floating on the water and on the shorelines as found in the US Fisheries Best Management Practices. Why? Because these dead fish are chemically contaminated and eventually rot and decay. Some dead fish float and some go to the bottom of the lake. The resulting four months of stink and smell from surface waters as well as the bacterial contamination to potable water in

wells during the dissipation period is just disgusting. Especially, if the lakes freeze over in the winter months during the scheduled dissipation time.

2. How does one protect property owners from extreme toxic chemicals dissipating into the atmosphere to affect human health? By developing an organized air quality monitoring plan utilizing special instruments and continued monitoring during and after applications.

This is not even mentioned in the NPDES permit, or even listed as a problem. It has been a dilemma in past Rotenone applications, especially in 2006 at Blue and Park Lakes. Liquid Rotenone and Powdered Rotenone have distinctive smells and you can be physically affected and some people may get light headed. This was experienced on the Arlt Family Limited Partnership property in 2006. The result led to immediately vacating the property and residence for four months, as that property location is downwind from the Park Lake Rotenone applications. The neighbors Bob and Velda Gregson also vacated their residence for about the same length of time at about the same time. The dangers at that time were unknown and still are.

Powdered and Liquid Rotenone are 5% Rotenone and 95% mixtures of toxic chemicals that are labeled as Inert Ingredients. Inert Ingredients are not explained as to exactly what chemicals they are.

I have reviewed the entire document carefully for the Department of Ecology State of Washington, "Washington State Water Quality Standards: Human Health Criteria and Implementation tools", January 2016 (82 pages) set forth by Governor Inslee.

On page 6 of that document (in blue background) Governor Inslee stated three primary items. I have summarized the first two below.

1. He proposed update to the State's water quality standards.
2. He wanted to reduce actual risk to cancer and other harmful effects to make our waters cleaner and safer.
3. "But Inslee said the state must also act on the many toxic chemicals from other unregulated sources that the Clean Water Act doesn't address. Inslee said he is calling on the Legislature next year to pass a toxics reduction bill as part of the state's submittal to the U.S. Environmental Protection Agency."

This clean act legislation went into effect January 2016.

In the past I have met with Jeff Korth from Fish and Wildlife in Ephrata on July 18, 2008 in the FW Building to deliver a 21 page Comments document to him titled, "AQUATIC HORROR". This document was basically ignored, that addressed most of the concerns of the 2006 Rotenone Application to Blue and Park Lakes.

In July of 2015 I was given 3 minutes for Oral sworn Testimony in Moses Lake at the meeting for the draft of the existing 2015 NPDES Permit above. I also submitted extensive written comments, video clips and still photographs which was placed on the Ecology website. Some attention adjustments were made in the new 2015 NPDES Permit based on that data and information.

In all these previous items since July 18, 2008 I have requested that the Rotenone Application program to be terminated and still do.

Why? Neither the current NPDES Permit nor any of the previous versions support any of the current Mission Statements for Ecology, Fish and Wildlife or the new 2016 Washington State Water Quality Standards:

Human health criteria and implementation tools. This item is now about human health and not rehabilitation of "Trout Fish" with the weapons of extreme toxic chemicals to use in this state. This has to be a big pain to Ecology every year.

The Blue and Park Lake rehabilitation plan and the current NPDES permit does not fit at all with the Clean Water Act of January 2016, in fact it is a complete opposite to any of it!

They don't put those Extreme Toxic Chemicals labels on the 341 drums of powdered rotenone of approximately 100,000 lbs. or on the 50 gallon drums of about 1,000 gallons for Liquid Rotenone as warnings for all the fish that are going to be killed in Blue and Park Lake. They put those Big Red and Black labels with the skull and cross bones on those containers for the dangers of human beings as clear serious warnings.

2016 Rotenone Applications have to affect wildlife and previously we watched the Eagles of Park Lake and Blue Lake pick up dead contaminated fish, fly up to their nesting area and eat them. We even video taped them doing that in November of 2006 on Park Lake.

All property owners living on shorelines at Blue and Park Lakes have little to say about our safety or the quality of water we use for recreation and domestic use. The well water is called potable water and is attached to the term domestic use.

Over the decades we have continually lost the battles about Rotenone Applications and F&W Lake Rehabilitations in Eastern Washington. In the meantime, Western Washington has none of the Rotenone Applications to worry about as Fish and Wildlife stopped those decades ago on the west side of the state.

There is a very simple answer for us on this. Fish and Wildlife can manage Eastern Washington Fish Management exactly the way they manage Western Washington, by not poisoning surface waters and planting larger fish in all the chain of lakes they plan to rehabilitate in October and November of this year in Eastern Washington.

In the long run the abuse of this Rehabilitation Lake Program needs to be terminated as soon as possible. In 2006 there were numerous serious violations of the NPDES Permit. I foresee that happening again this year Rotenone is put into the surface waters for the 10th application in history on these lakes.

Other States have banned the Rotenone application process as it is just too dangerous to human health.

We, the Arlt Family Limited Partnership have a new website especially devoted to this Rotenone Application Lake Rehabilitation problem. The link to it is at: rotenoneparkinsons.com.

Respectfully yours,

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