

March 28, 2018

**Ms. Susan Braley
Water Quality Program
Washington State Dept. of Ecology
PO Box 47600
Olympia, WA 98504**

Dear Ms. Braley,

Thank you for the opportunity to comment on the proposed changes to Policy 1-11. The Washington Association of Sewer and Water Districts represents more than 180 public sewer and water districts in the state, serving 25% of our state's population. Clean water is a major concern to both our membership and the clients they serve. We attended one of the workshops that presented an overview of the changes to the current draft policy, and found it to be well organized and presented. We support many of the changes in the policy, particularly those that seek to clarify how data will be interpreted.

We do have a few specific comments on the draft policy, as outlined below:

1. Section 1D Ensuring Data Credibility in the Assessment, starting page 22

This section has improved over the previous draft in that it indicates Ecology will check all data being entered into the EIM, instead of just spot checks. It also reinforces strict measures of QA/QC for data gathered and submitted in support of the Water Quality Assessment. However, it still indicates that data deemed unusable will still be retained in the EIM, with appropriate notation. We would suggest that data considered unusable for the WQA be removed from the EIM. We fail to see what other use the data would have if it fails QA/QC rigor. It is also still not clear if QA/QC information submitted for the WQA will be available for public inspection, which we insist is necessary. In a scientific context, if you wish to scrutinize the results of an experiment, the first thing you examine is methodology and QA/QC. This should apply as well for methods and QA/QC for data submitted for the WQA.

2. Section 1E Data and information Submittals, starting page 26

There is now no specific mention of Ecology's unwillingness to accept continuous data sets. Does this mean such data falls under the section

indicating that a data submitter may make special arrangements with Ecology to submit data? This needs to be further clarified. Continuous data is easier to collect than ever before, and can be a powerful tool in detecting seasonal or diurnal variations and trends. Ecology needs to accept and utilize continuous data.

The statement that only one data point per parameter per day per assessment unit seems to preclude the use and acceptance of continuous data. It also seems to conflict with the statement that EPA requires that all data in a data set be submitted, not just selected portions. Again, Ecology must develop guidelines for acceptance and use of continuous data.

Starting on page 29 is the discussion of the age of data. Data older than 10 years, collected under less stringent QA/QC protocols, before the implementation of appropriate SOPs, should not be used for any aspect of the WQA. This information may still have value for determination of historical natural conditions.

3. On page 43, number 3, Estimate or projection of time when water quality standards will be met
This section describes what is needed to gain placement in Category 4B in terms of proposed controls and the timeframe needed to attain WQS. Does this language mean that timeframes in excess of the standard maximum of 10 years are now possible?
4. 1G Other Assessment Considerations – Natural conditions, page 49
This section mentions some of the natural conditions occurring in marine waters, such as upwelling, circulation and thermal effects. It would be helpful if some natural conditions for rivers were mentioned as well. Unique to our region is the presence of arsenic in rivers associated with snowmelt from volcanoes. Valuable time, energy and money have been spent chasing anthropogenic sources of arsenic when it was the mountain all along (referring to the Puyallup River Mediation).
5. 1H Prioritizing TMDLs, page 53
Having attended the prioritization workshop for this cycle, we appreciated the opportunity to comment on TMDLs for the upcoming year. This is a useful public forum, and eliminates the surprise element that had sometimes occurred in the past.
6. 2B Benthic Biological Indicators, starting page 65

It is not clear who will be responsible for stressor identification studies. It seems that this type of study could be very expensive and time consuming, well beyond the expertise and financial capability of some jurisdictions and agencies. This would be particularly unfair if caused by a private party. Could this end up being a permit requirement? Ecology should conduct such studies, perhaps as part of the 5 year assessment of watersheds.

- 7. For Category determinations for DO, pH and temperature, this draft policy indicates that a single parameter value far beyond the criteria would result in a 303d listing. This is highly presumptive, and not based on good science. It could be the result of a discreet anthropogenic discharge, and therefore not representative of the seasonal average. It also indicates once again the value of continuous data. This should be removed from the policy.**

Thank you for all your work in clarifying how data will be obtained and utilized in the Water Quality Assessment.

Sincerely,

**James Kuntz
WASWD Executive Director**

March 28, 2018

**Ms. Susan Braley
Water Quality Program
Washington State Dept. of Ecology
PO Box 47600
Olympia, WA 98504**

Dear Ms. Braley,

Thank you for the opportunity to comment on the proposed changes to Policy 1-11. The Washington Association of Sewer and Water Districts represents more than 180 public sewer and water districts in the state, serving 25% of our state's population. Clean water is a major concern to both our membership and the clients they serve. We attended one of the workshops that presented an overview of the changes to the current draft policy, and found it to be well organized and presented. We support many of the changes in the policy, particularly those that seek to clarify how data will be interpreted.

We do have a few specific comments on the draft policy, as outlined below:

1. Section 1D Ensuring Data Credibility in the Assessment, starting page 22

This section has improved over the previous draft in that it indicates Ecology will check all data being entered into the EIM, instead of just spot checks. It also reinforces strict measures of QA/QC for data gathered and submitted in support of the Water Quality Assessment. However, it still indicates that data deemed unusable will still be retained in the EIM, with appropriate notation. We would suggest that data considered unusable for the WQA be removed from the EIM. We fail to see what other use the data would have if it fails QA/QC rigor. It is also still not clear if QA/QC information submitted for the WQA will be available for public inspection, which we insist is necessary. In a scientific context, if you wish to scrutinize the results of an experiment, the first thing you examine is methodology and QA/QC. This should apply as well for methods and QA/QC for data submitted for the WQA.

2. Section 1E Data and information Submittals, starting page 26

There is now no specific mention of Ecology's unwillingness to accept continuous data sets. Does this mean such data falls under the section

indicating that a data submitter may make special arrangements with Ecology to submit data? This needs to be further clarified. Continuous data is easier to collect than ever before, and can be a powerful tool in detecting seasonal or diurnal variations and trends. Ecology needs to accept and utilize continuous data.

The statement that only one data point per parameter per day per assessment unit seems to preclude the use and acceptance of continuous data. It also seems to conflict with the statement that EPA requires that all data in a data set be submitted, not just selected portions. Again, Ecology must develop guidelines for acceptance and use of continuous data.

Starting on page 29 is the discussion of the age of data. Data older than 10 years, collected under less stringent QA/QC protocols, before the implementation of appropriate SOPs, should not be used for any aspect of the WQA. This information may still have value for determination of historical natural conditions.

3. On page 43, number 3, Estimate or projection of time when water quality standards will be met
This section describes what is needed to gain placement in Category 4B in terms of proposed controls and the timeframe needed to attain WQS. Does this language mean that timeframes in excess of the standard maximum of 10 years are now possible?
4. 1G Other Assessment Considerations – Natural conditions, page 49
This section mentions some of the natural conditions occurring in marine waters, such as upwelling, circulation and thermal effects. It would be helpful if some natural conditions for rivers were mentioned as well. Unique to our region is the presence of arsenic in rivers associated with snowmelt from volcanoes. Valuable time, energy and money have been spent chasing anthropogenic sources of arsenic when it was the mountain all along (referring to the Puyallup River Mediation).
5. 1H Prioritizing TMDLs, page 53
Having attended the prioritization workshop for this cycle, we appreciated the opportunity to comment on TMDLs for the upcoming year. This is a useful public forum, and eliminates the surprise element that had sometimes occurred in the past.
6. 2B Benthic Biological Indicators, starting page 65

It is not clear who will be responsible for stressor identification studies. It seems that this type of study could be very expensive and time consuming, well beyond the expertise and financial capability of some jurisdictions and agencies. This would be particularly unfair if caused by a private party. Could this end up being a permit requirement? Ecology should conduct such studies, perhaps as part of the 5 year assessment of watersheds.

- 7. For Category determinations for DO, pH and temperature, this draft policy indicates that a single parameter value far beyond the criteria would result in a 303d listing. This is highly presumptive, and not based on good science. It could be the result of a discreet anthropogenic discharge, and therefore not representative of the seasonal average. It also indicates once again the value of continuous data. This should be removed from the policy.**

Thank you for all your work in clarifying how data will be obtained and utilized in the Water Quality Assessment.

Sincerely,

**James Kuntz
WASWD Executive Director**