

May 21, 2018

Washington State Department of Ecology  
Attn. Becca Conklin  
PO Box 47600  
Olympia, WA 98504-7600

**By email to:** [swqs@ecy.wa.gov](mailto:swqs@ecy.wa.gov) or [online comment form](#)

Dear Ms. Conklin,

Thank you for the opportunity to comment on the scoping of the Environmental Impact Statement for recreational use criteria. Washington Environmental Council (WEC) supports the Department of Ecology's process to enhance the protection of people who contact water during recreational use in our state fresh and marine waters.

WEC is a 501(c)(3) organization founded in 1967. Our mission is to protect, restore, and sustain Washington's environment for all, and we are committed to clean water protections for Puget Sound and for all Washington State waters.

As a member of the Recreational Use Criteria Technical group, WEC would like to take this opportunity to submit the following scoping comments:

- The EIS should consider the freshwater indicator for recreation use criteria and illness rate that is most protective and best interest of human health and is in the best interest of public health.
- The EIS should not hide bacteria spikes that could have impacts to public health and should evaluate the alternative averaging period for samples that provides robust and accurate data.
- The EIS should evaluate the impacts and benefits of different minimum sample number sizes for averaging. The current recreational use criteria recommends five or more data collection events per season for averaging.
- The EIS should evaluate the impacts of adopting or not adopting EPA's cyanotoxin criteria for recreation and the benefits and impacts of Department of Health's recreational guidance values that is being currently used.
- The EIS should consider environmental impacts of the various transition times and plans being considered to implement the new recreational use criteria once adopted and evaluate lessons learned when Department of Ecology changed the standard method for total phosphorus over ten years ago.



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- The EIS should address public health impacts and water quality impacts while transitioning and adopting new bacteria TMDL's or addressing existing bacterial TMDL's.

Thank you for considering our scoping comments as you evaluate the benefits of updating the state's fresh and marine water quality standards.

Sincerely,

Rein Attemann

Puget Sound Campaign Manager

[rein@wecprotects.org](mailto:rein@wecprotects.org)