



May 21st, 2018

Washington State Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

Re: Rulemaking to amend Chapter 173-201A WAC, Water Quality Standards for Surface Waters

Dear Ecology,

The Snoqualmie Indian Tribe is a federally recognized tribe in the Puget Sound region of Washington State. Known as the People of the Moon, Snoqualmie tribal members were signatories to the Treaty of Point Elliott in 1855. The Tribe owns and operates the Snoqualmie Casino in Snoqualmie, WA.

The Snoqualmie Indian Tribe believes the state should use the most up to date and effective water quality standards available and applaud Ecology for updating its Marine and freshwater fecal coliform standards. The state should push for the strongest standards reasonable for the protection of humans and marine shellfisheries. FDA requires marine shellfisheries to meet an enterococcus standard, while EPA wants E. coli for recreational waters and beaches, in which case both standards should be met where feasible. The Snoqualmie Tribe implores Ecology to focus on doing what is right for the health and safety of the water users, not what is more administratively convenient.

While a final decision is still forthcoming there are several concerns that the tribe has over this regulatory change. Will the previously issued TMDL permits be grandfathered in under the current standard or will there be a transition period applicable to all permits? How will new protocols rollouts be initiated? How will the TMDL permits will be handled during the transition? Additionally, we implore the state to have some flexibility for monitoring programs to switch to measuring the new standards in the transition period and that is time left for analysis during the transition.

Please keep us informed about any ongoing proposed changes.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Baerwalde", followed by a long horizontal line.

Matt Baerwalde
Water Quality Manager
Snoqualmie Tribe