

Makarow, Irina (ECY)

From: john.lovie@whidbey.com
Sent: Tuesday, October 27, 2020 8:42 AM
To: Flores, Lola (ECY)
Cc: Makarow, Irina (ECY)
Subject: Comment Form and Instructions
Attachments: Comment Form and Instructions.docx

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Hi Lola,

I have added an additional comment 6.

I've copied Irina Makarow from the PFAS CAP team. I'll be making a similar comment on the Draft PFAS CAP. Perhaps you folks are already talking, and my comment is unnecessary. But just in case!

Cheers,

John Lovie

Comment #	Initials	Document*	Section or Page #	Comment, Question, Suggestions, Etc.
Example	AA	N	p.1	To fill gap related to XX, see document YY, Table Z for supporting data.
1	JL	N	P14	Chemicals of emerging concern. Is this EPA's list?
2	JL	N	P22	2.2.3 Major Groups of Toxic Chemicals. Please consider including PFAS in this list. It is different for this class.
3	JL	N	P37	Introduction to Strategies. How does monitoring 4 classes of compound measure these 5 strategies?
4	JL	N	P43	Monitoring and Adaptive Management This very vague for something that is supposed to be one of 5 main strategies
5	JL	N	all	Short on detail of implementation of the strategies. Who will do this work? How will it be funded? What will be the intermediate measures? Vital sign is narrow – toxics in fish, life, and the measures also. But the strategies are (rightly) much broader and will have a broader impact. Is this another case where what we can measure is driving the work? Should TIF be an indicator rather than a vital sign?
6	JL	N	P22	Please take a look at the draft PFAS CAP https://fortress.wa.gov/ecy/publications/documents/2004035.pdf especially Section 2, Managing environmental PFAS contamination, p 50. Here, the state is setting consumption limits on <i>freshwater</i> fish based on Ecology fish sampling. We need to work with the PFAS CAP team to implement a program to look at PFAS in salmonids and pinnipeds as a proxy for orcas.

Toxics In Fish Implementation Strategy - Public Comment Form

September 2020

Stormwater Strategic Initiative Requests Public Comments for the:

Toxics in Fish Implementation Strategy (TIF IS)

The Stormwater Strategic Initiative is pleased to release the *Toxics in Fish* Stormwater Implementation Strategy (the Strategy) for public comment. The TIF Implementation Strategy outlines a recovery plan that is focused on reducing the levels and impacts of contaminants on Puget Sound aquatic life and the people who consume them. It includes a series of strategies that will prevent, mitigate and cleanup toxics in aquatic life throughout Puget Sound. Enactment of this Implementation Strategy will help prevent further toxic loading into Puget Sound and provide a pathway to clean up contaminated sites.

Please respond with your comments using this form by Friday, October 16.

Where to find the TIF Implementation Strategy

The public review draft of the Implementation Strategy (split into several components) is located here: [TIF Implementation Strategy](#).

Components:

- [Executive Summary](#): A brief description of the content within the implementation strategy narrative.
- [Implementation Strategy Narrative](#): A report that describes strategies, approaches, and activities for managing contaminants.
- Appendices
 - [State of the Knowledge](#): An analysis that provides a scientific and technical foundation to the Toxics in Fish (TIF) Implementation Strategy.
 - [Base Program Analysis](#): An analysis that describes the existing regulatory and programs that address issues related to managing toxic contaminants.

How to Review the TIF Implementation Strategy:

Please provide comments in the table below. Try to focus more on content and less on grammatical editing. (We will have another opportunity to correct formatting, typos, and grammar later). In the table below, the 3rd column labeled *Document*, please indicate what document you are referring to, see the codes below:

N: Implementation Strategy narrative

A Appendix Number = Appendix section (for example, if you have a comment on *Appendix Ib Results Chains*, you would put 'A_Ib' in the *Document* column below.

How to submit comments

Please return your completed table as an email attachment by October 16 to lola.flores@ECY.WA.GOV.

* Document codes: N = Written narrative, A_Appendix Number = Appendix section

Toxics In Fish Implementation Strategy - Public Comment Form

September 2020

Next steps

After October 16, we will review all comments received, revise the TIF Implementation Strategy, and prepare a comment response document. We will notify everyone providing comments when the final strategy is available.

Thank you in advance for your help in refining and improving TIF Implementation Strategy!

Please complete:

Name:

Affiliation / Organization:

Email:

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February, 2020