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Online submittal form:

https://wq.ecology.commentinput.com/?id=QmFx2&utm_medium=email&utm_source=govdelivery

The Interagency Team thanks the Washington State Department of Ecology (Ecology) for the opportunity to comment on proposed updates to the natural conditions provision found in section 1E of Water Quality Policy 1-11 (WQP 1-11).

Our comments and recommendations are below.

- 1) Section 1E. of proposed changes to WQP1-11 indicates that information provided to make a natural conditions determination must clearly document the connection between a persisting environmental alteration occurring with an assessment unit and the effects to the designated use in the same assessment unit in order to meet credible data requirements. The connection between these two lines of evidence is necessary to make a reasonable impairment determination.

This and other proposed language in section 1.E focuses on information needed to support a Category 5 determination, while lacking guidance on how Category 1 determinations will be made based upon natural conditions.

An attempt to find documentation of natural conditions determinations was made through the Water Quality Assessment database. We searched for Category 5 to 1 changes for all parameters statewide from current back to the 2004 list, and queried the remarks field for the term "natural". The query returned a total of 7 pH listings that were changed due to a study finding naturally low pH. The information was difficult to find and didn't provide documentation used to support those decisions.

Recommendations:

- Consider adding a natural conditions field and filter to the water quality assessment and atlas databases which provides clear documentation of the connection between a persisting environmental alteration and the effects to the designated use or the lack thereof. This would also allow stakeholders to identify and track natural condition listing decisions more easily.
- Consider adding language to the natural conditions provision which explains how Category 1 determinations are made based upon natural conditions.

- 2) Data collectors' knowledge of waters sampled and resulting credibility of the data supportive of natural conditions determinations includes, but is not limited to, extent of potential human influences, representativeness of waters sampled, and appropriateness of sampling and analytical methods, QAPP notwithstanding.

For example, King County submitted comments on Ecology's 2014 Water Quality Assessment suggesting that 22 different Category 5 listings for pH were due to natural conditions.

Ecology's response for each was that the listings would remain in Category 5 and that an evaluation and potential determination of natural conditions would not be made unless "definitive information" is provided to validate that human influences did not or were not likely to cause exceedances. Ecology also referred King Co to WQP 1-11 for more information.

Unfortunately, Ecology did not identify the "definitive information" necessary to make an evaluation of non-impairment due to natural conditions.

Without easy access to documentation or further guidance on the "definitive information" needed to support an evaluation of non-impairment due to natural conditions, agencies are often obligated to implement ongoing programs to address a Category 5 listing due to natural conditions when resources could be better spent elsewhere.

Recommendations:

- Consider updates to WQP 1-11, providing a menu of definitive information needed to support an evaluation of non-impairment due to natural conditions.
- When providing response to comments on the Water Quality Assessment, it would benefit stakeholders to be informed of the "definitive information" needed to support a natural conditions determination for any category.

Regards,

The Interagency Team: staff from King County, Pierce County, Snohomish County, Thurston County, Thurston County Public Health and Social Services, City of Everett, City of Bothell, and the Washington State Department of Transportation