

Brandon Bowersox-Johnson

Dear Ms. Marla Koberstein,

I want my son to grow up to inherit a livable, healthy environment. And I want Washington waters to be safe for salmon and provide thriving aquatic ecosystems. In this era of climate collapse, now is no time to weaken our water quality standards.

I am writing with comments on Ecology's Natural Conditions Proposed Rule under Chapter 173-201A WAC (Water Quality Standards for Surface Waters of the State of Washington). I live in Seattle and I care deeply about protecting ecosystems across our state.

First, you probably know that "...it is the public policy of the state of Washington to maintain the highest possible standards to insure the purity of all waters of the state consistent with public health and public enjoyment thereof, the propagation and protection of wild life, birds, game, fish and other aquatic life, and the industrial development of the state...." That is according to Chapter 90.48 of the Revised Code of Washington. So Ecology should NOT weaken the state water quality standards for dissolved oxygen or temperature, which are both critical to the survival and future of salmon and other aquatic life.

During your tenure at Ecology and that of your predecessors, Ecology has been managing waters of the state using the human allowances of 0.2 mg/L dissolved oxygen and 0.3°C temperature using known and reasonable technologies. Any increase in the allowance would be inconsistent with Chapter 90.48 RCW cited above.

Secondly, Ecology should not risk a jeopardy finding under the Endangered Species Act. In 2008, both the National Marine Fisheries Service and US Fish and Wildlife Service found that human allowances of 0.2 mg/L of oxygen or 0.3°C for temperature when natural conditions are worse than the numerical standards would be insignificant and unlikely to harm endangered species. Any process that deviates from those values would require additional Biological Opinions. It is my understanding that a jeopardy finding would cause significant delays in the adoption of these water quality standards. The most efficient path that maintains species protections is to maintain the current levels of 0.2 mg/L dissolved oxygen and 0.3°C when natural conditions are worse than the numeric values in the water quality standards.

Finally, I urge Ecology to factor climate change into the human allowances. Climate change will warm waters through a variety of processes, and warmer water holds less oxygen. This means there is less capacity for impacts from current human activities, and we need more stringent regulatory requirements because we have less wiggle room.

I have heard that polluters are suggesting a long process to make room for weaker standards. That sounds incompatible with the needs of current and future generations of salmon and human children. Ecology needs protective approaches for temperature and dissolved oxygen now. We urge you to reject any efforts that would delay implementation of stringent water quality standards across the state. Thanks for your work on this important issue.

Thank you, Brandon Bowersox-Johnson
519 N Bowdoin Pl Apt 401 Seattle, WA 98103