

# Nora Nickum

Dear Ms. Marla Koberstein,

Thank you for the opportunity to comment on Ecology's Natural Conditions Proposed Rule under Chapter 173-201A WAC, Water Quality Standards for Surface Waters of the State of Washington.

I personally care very much about maintaining protective water quality standards throughout Washington's waters.

To remain consistent with RCW 90.48, 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. 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 for decades. Any increase in the allowance would be inconsistent with Chapter 90.48 RCW.

Second, Ecology must 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.

Third, Ecology should not risk a jeopardy finding under the ESA. 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. 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.

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. Please don't listen to polluters asking for more time, in order to end up with weaker standards.

Washington communities and wildlife rely on clean water. You can ensure it remains reliably available.

Thank you, Nora Nickum  
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