

April 22, 2025

Marla Koberstein
Department of Ecology, Water Quality Program
PO Box 47600
Olympia, WA 98504

Via online portal

Re: Ecology's 2025-2027 Triennial Review of Chapter 173-201A WAC, Water Quality Standards for Surface Waters of the State of Washington

Dear Marla Koberstein:

Puget Soundkeeper (PSK) respectfully submits these comments on Ecology's 2025-2027 Triennial Review of Chapter 173-201A WAC, Water Quality Standards for surface Waters of the State of Washington.

PSK has been fighting for clean water throughout the Puget Sound watershed for over 40 years. As a member-based nonprofit organization, our mission is to protect and enhance these waterways for the health and restoration of our aquatic ecosystems and the communities that depend on them. Much of our work focuses on stormwater pollution and engaging the community in beach and water cleanups. We are deeply invested in solving the threats to water quality, particularly those posed by 6PPD and 6PPD-quinone (together herein "6PPD/Q") and plastic, and pursuing the solutions we know are within reach.

We recognize the significant efforts that have gone into the development of Ecology's 2025 Triennial Review process including choosing priorities, and we commend the steps taken to address critical water quality issues. Our comments are intended to further strengthen the planning process and water quality standards within the state of Washington and protect our valuable water resources and affected salmon and trout fisheries.

1. Prioritize 6PPD/Q for chronic criteria and marine waters when updating aquatic life toxics criteria

Washington State has been a leader when it comes to 6PPD/Q since it was discovered in December 2020 by Washington-based academics. Ecology updated its aquatic life toxics criteria in 2024 and included 6PPD/Q freshwater acute at 0.012 µg/L. This criterion is now waiting for federal approval which Ecology notes, "can take years." We urge Ecology to continue moving forward with its work around 6PPD/Q as we figure out how to further address this pollutant in runoff, stormwater, combined sewage overflows, and other discharges.

In its priorities for 2025-2027 Ecology plans on updating aquatic life toxics criteria again for iron, hydrogen sulfide, heptachlor epoxide, and alkalinity. We know the harm that 6PPD/Q causes to aquatic species that live in both fresh *and* marine waters in Washington. We know that it will

take years to finalize and obtain EPA's approval for another round of aquatic life toxics criteria. Thus, Ecology should include 6PPD/Q criteria for chronic freshwater and acute and chronic for marine waters in this next round of triennial planning. These criteria all play an important role for the quality of Washington's waters, particularly for the Sound and its tributaries which include a mix of both fresh and marine waters. Effective environmental management requires understanding and mitigating each of these types of effects to preserve aquatic life and biodiversity.

Soundkeeper asks Ecology to use the power of momentum around 6PPD/Q to develop chronic freshwater and marine criteria. Given the extreme mortality caused by this chemical wherever it is discharged – including into estuaries, rivers, marshes, and in places at the very mouths of salmon spawning streams, Soundkeeper also asks Ecology to apply the current freshwater acute criteria in marine waters as well.

2. Prioritize plastics and aquatic litter

Further, we ask that Ecology prioritize plastics and aquatic litter. Soundkeeper engages in regular cleanups around the Sound and has a front row seat to the plastic pollution problem in Washington. Plastic does not break down; it breaks up into smaller and smaller pieces. Microplastics pose a serious threat to our wildlife species due to ingestion and toxic accumulation.

For these reasons we ask that plastic and aquatic litter are prioritized for inclusion in the next water quality assessment and 303(d) list preparation.

Sincerely,

Kelsey Furman
Staff Attorney
Puget Soundkeeper
kelsey@pugetsoundkeeper.org