

The Department of Ecology's Response to:  
Miyoko Sakashita – Center for Biological Diversity (Comment 37)

Ecology has considered the information and studies that you submitted with your request to include all ocean water segments in Washington's List of Impaired Waterbodies ("303(d) List") under section 303(d) of the Clean Water Act as impaired for pH due to absorption of anthropogenic carbon dioxide pollution. The Center for Biological Diversity makes the argument that scientific research demonstrates the threats to ocean acidification. Our state law requires that actual data be used for 303(d) listing purposes, rather than broader studies and assumptions about the status of waters. Ecology reviewed the studies that were submitted in previous correspondence and could find no monitoring data relevant to specific marine waterbody segments in Washington. This would be needed in order to create a 303(d) listing showing exceedances of pH for the purposes of conducting a Total Maximum Daily Load (TMDL) for that specific area. The state of Washington passed a Water Quality Data Act (codified in RCW 90.48.570 through 90.48.590) that requires actual data in order to put a waterbody segment on the 303(d) list. See related policies at: [http://www.ecy.wa.gov/programs/wq/303d/policy1-11\\_rev.html](http://www.ecy.wa.gov/programs/wq/303d/policy1-11_rev.html).

We do understand your concerns and believe that the Center for Biological Diversity makes some sound conclusions that looking at historical data and recent trends, ocean acidification appears to be increasing most probably due to anthropogenic sources. Washington state takes climate change seriously and is doing its part to reduce greenhouse gas emissions. We have become a leading state in confronting climate change aggressively through state legislation and active work at the Department of Ecology. To get more information on what the department is doing to address climate change, go to <http://www.ecy.wa.gov/climatechange/index.htm>.