

**From:** NOREPLY@ECY.WA.GOV  
**Sent:** Thursday, July 21, 2011 4:52 PM  
**To:** 303d  
**Cc:** Herold, Mike (ECY); Brown, Chad (ECY); Braley, Susan (ECY); Koch, Ken (ECY)  
**Subject:** \*\*\* WQ ASSESSMENT - COMMENT ON LISTING 64738 \*\*\*0023

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**WATS 2010 REVIEW TOOL: Comment on Listing 64738**

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SENDER'S NAME: Lincoln Loehr  
SENDER'S EMAIL: [lcloehr@stoel.com](mailto:lcloehr@stoel.com)  
SENT: 7/21/2011 4:53:09 PM  
WEB LINK: [Listing 64738](#)  
MAP LINK: [Listing 64738](#)

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**COMMENT:**

Probably shouldn't list for Graceful Crab since WDFW regulations prohibit harvesting them anyway. Also shouldn't list on hepatopancrease tissue for any crab, as I suspect all crabs will fail for arsenic here if you look for it, and natural sources alone could cause that. Also was there a natural conditions evaluation prior to this determination? Background arsenic in the Pacific exceeds our human health criterion by a factor of 10.