

April 1, 2016

Via Electronic Submission To 303(d)@ecy.wa.gov

Heather Bartlett
Water Quality Program Manager
Washington Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600



RE: Department of Ecology Notice: Scoping Process for the Water Quality Policy 1-11, January 20, 2016

Dear Ms. Bartlett:

The Boeing Company appreciates the opportunity to suggest areas to include in the scope of potential revisions and/or clarifications to the 2012 Water Quality Policy 1-11 (WQP 1-11).

The Clean Water Act (CWA) charges States with the responsibility of assessing waters within their jurisdiction and based upon that assessment, develop and implement strategies to improve water quality.

The Boeing Company is committed to water quality improvement approaches that focus on a combination of measures, such as restoring ecological functions, utilizing green infrastructure, and applying an integrated watershed approach that targets both point and non-point sources in an environmentally and economically sustainable way. These approaches have already been demonstrated to improve water quality as well as provide notable social and economic benefits.

In 2013 EPA announced a new CWA 303(d) program vision that acknowledges that States have flexibility in selecting and using available water quality improvement tools and that there is not a "one size fits all" approach to restoring and protecting water resources.

In October 2015, Boeing along with several other stakeholders met with Ecology staff to discuss key elements in the current water quality policy that warrant review and potential revision. The areas discussed were previously submitted to Ecology in a June 5, 2015 letter from the Association of Washington Business.

In light of EPA's new vision and with a focus on holistic watershed-based approaches, we recommend the following policy areas be included in the scope of review:

- Age of data that is relied upon to support category 5 listings, WQP 1-11 pages 7 & 19
- Data Quality Assurance/Quality Control, WQP 1-11 page 10
- Use of grab samples to represent criteria based upon averaging, WQP 1-11 page 20

- Other Pollution Control Program and Category 4b listings , WQP 1-11 page 15
- How natural conditions are evaluated in temperature and dissolved oxygen water quality criteria, WQP 1-11 pages 37 and 43
- Data quantity thresholds supporting category 5 listings, WQP 1-11 pages 37 – 53
- Category 5 listings based upon fish tissue concentrations and bioassay results, WQP 1-11 pages 47 – 51

Other areas for discussion include:

- Objective of the policy revision and potential changes based upon 2013 EPA's new vision
- Use of bioassessment or bioaccumulative data
- Development of a de-listing scenario
- Impact of EPA's review and approval/disapproval of WA 2015 integrated report
- Integration of a potentially revised policy with the new 2016 call for data

The Clean Water Act gives States the discretion on science and policy decisions that comprise the assessment methodology. This is a unique opportunity to develop holistic and integrated approaches that may be more immediately beneficial and/or practicable to achieving real, long-term water quality goals and objectives. The areas identified above are all equally significant due to the potential impacts on Washington waters. While the January 20th notice indicates that Ecology will determine the priority of the areas for review, we request that Ecology include all identified areas as topics for discussion and allow the public the opportunity to participate in the prioritization process.

Thank you for considering these ideas and we look forward to the public review.

Sincerely,



Steve Shestak
Director, Environment
Environment, Health and Safety