

From: Rebecca Blackman [R.Blackman@co.island.wa.us] Sent: Mon 12/13/2010 1:37 PM
To: ECY RE SWQS
Cc:
Subject: Comments for the Triennial Review

Becca Blackman, Island County Public Health

My comments on the Process for the Surface Water Quality Standards are as follows:

According to Table 602 in Chapter 173-201A WAC there are no designated uses for Fresh Waters in WRIA 6 (Island County). The standards that do apply to the waters of Island County are set by the standards in the receiving waters surrounding the county. In some water bodies that this affects, the standard of water quality that is required can simply not be reached due to the properties of that water body. For example- most streams are intermittent or ephemeral. Flow levels in some areas are so low that they drip from culvert to culvert before they reach the beach and outfall into the marine environment. Language needs to be formed in this chapter to address situations like these. If data is necessary to form these standards, then data needs to be collected or researched. While Island County is a small jurisdiction when compared to the state as a whole- a surface water quality monitoring program is in place and should hold the importance of the rest of the programs in place; its freshwater standards should be addressed.

The standards and reasons for each standard should be easier to understand. In the document "Waters Requiring Supplemental Spawning and Incubation Protection for Salmonid Species" separate maps for each WRIA graphically display the categories each listed rivers/streams/tributary falls into for the Aquatic Life Use Category. A graphic map like this for Table 612 in Chapter 173-201A WAC and its GIS layers should be available for the marine standards as well. It should be easy for the public to go to the DOE website and find resources on state standards where they live- no matter where they live. From both a public employee perspective and a resident of the Puget Sound region- information on water quality protection levels needs to be easily accessible to the public. The reasons as to why each standard was designated also needs more clarity. For example- Of the 191 watersheds in Island County, over 40 drain into the West side of Whidbey Island. For this area only one standard is given, to protect shellfish harvesting. One standard for that large of an area is not descriptive enough of the actual uses that go on. The reasons for why the standards became what they are, and under what scale they should be designated, needs to be evaluated.

Understanding that DOE does not use or create google earth's kmz files, their GIS files should be easy to access. The state DOH has numerous layers available on their website, just as the DOE should also. While this will require some maintenance when updates are made- most of these layers are already created and should not be much of a burden to post.

These are my thoughts on the current surface water standards and having tried to understand and work with them for almost three years.

Becca Blackman
Water Quality Specialist
r.blackman@co.island.wa.us
(360) 240-5543
Resource Enhancement Program
Island County Public Health