June 4, 2021

Department of Ecology
Water Quality Program PO BOX 47600
Olympia, WA 98504-7600
ATTN: Jeremy Reiman

Dear Mr. Reiman,

The Interagency Team (IAT) appreciates the opportunity to provide comment on the Department of Ecology's (Ecology) draft Water Quality Assessment (WQA) and associated tools (e.g., Environmental Information Management (EIM) and the Water Quality Atlas). The IAT also appreciates Ecology's work to improve the Water Quality Policy 1-11 (WQP 1-11) and the WQA process since 2016. Please consider these IAT comments and recommendations:

1. **Comment:** Identifying data not deemed usable for listing decisions has value as it provides transparency and supports quality assurance objectives. For example, Oregon has used Category 1 for data not assessed and Category 3d for data infeasible to assess. Similarly, California has used Category 3 for data not used in the assessment.

   Recommendation: For future WQA's, consider using a Category or a sub-category to identify data not used or deemed credible for listing decisions.

2. **Comment**: Other states use sub-categories to make distinctions between data insufficiencies. This could be a helpful tool for categorizing listing and impairment challenges, as well as prioritization efforts.

   Recommendation: For future WQA's, consider using subcategories to Category 3 to help distinguish data insufficiencies in a way that will be helpful for identifying challenges and prioritizing work.

3. **Comment**: The Environmental Protection Agency supports TMDL alternative approaches to prioritize water clean-up efforts and get to cleaner water faster than through a formal TMDL in certain watersheds. The process and terminology associated with these efforts in Washington State (e.g., 4b approach, Alternative Restoration Plans, Straight-to-Implementation (STI)) can vary widely and are not well understood by most stakeholders. Classifying and defining these types of approaches using a Category would help clarify processes and terminology.

   Recommendation: For future WQA's, consider adding a sub-category 5 to identify TMDL alternative approaches for waters that remain in Category 5.

4. **Comment**: The Water Quality Atlas functionality would be enhanced if it included highway mileposts.

   Recommendation: Consider adding highway milepost data from WSDOT's internet Geodata Catalog page and selecting the "State Route Milepost Markers of Washington State".

5. **Comment:** Salish Sea Model (SSM) outputs have been used to generate new Category 5 listings for dissolved oxygen in both fresh and marine waters. WQP 1-11 does not list the SSM as

approved for any listing purpose. Further, Ecology's SSM QAPP (Publication No. 18-03-111) indicates the model is only to be used to estimate water quality outcomes. While the SSM may be predicting water quality impairment in particular areas, whether using that or any other model for prediction, Ecology must conduct monitoring and collect sufficient field data to establish actual impairment before assigning Category 5 for any pollutant to any waterbody segment.

Recommendation: Clarify how Ecology determined that outputs from the SSM meet conditions of WQP 1-11 for dissolved oxygen listings.

6. **Comment:** Twenty-nine percent of Statewide Category 5 bioassessment listings have no known source (either EIM or the Water Quality Portal) listed when exported from the water quality assessment tool. Without knowing the source, what basis does Ecology use to determine the credibility of data?

   Recommendation: Review Category 5 bioassessment listings and describe the source (EIM or Water Quality Portal) of the data used. Regardless of the data source, we encourage Ecology to describe how the credibility of data was confirmed to support a Category 5 listing. If Ecology cannot confirm data credibility for these listings, they should be removed, or at most placed into Category 2.

7. **Comment:** WQP 1-11 considers data credible for use if the studies are listed in EIM as having QA planning and assessment levels of 3 or higher. However, the QA and assessment levels in EIM are assigned by the data submitter. Thus, Ecology appears to rely on a presumptive approach when assessing data credibility given that EIM does not have the capability for data submitters to upload QAPPs, SAPs or equivalent documents to support an authentic evaluation of data quality objectives and intended use. While the IAT appreciates the variety of challenges involved in ensuring credible data, there may be several ways of making improvements.

   Recommendations: Some potentially easily implementable improvements to enhance data credibility assumptions, may include:

   - Using hyperlinks to connect users to the Publications Database that contains Ecology's QAPPs and reports (hyperlinks are already utilized for other purposes in the WQA tool).
   - Requiring a data submitter signatory certification (like the signatory certification required when discharge data is submitted for the NPDES Construction Stormwater General Permit). If signatory certification is required for construction discharges, a certifying signature seems appropriate for data submittals that form the basis of WQA listing decisions.

The IAT sincerely appreciates the opportunity to participate in the stakeholder engagement efforts and provide public comment on this important work.

Thank you,
The Interagency Team