



Northwest Indian Fisheries Commission

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August 24, 2017

Kelly Susewind
Special Assistant – Water Policy
Washington State Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

Re: NWIFC Preliminary Comments, Water Quality Assessment: Policy 1-11 Update

Dear Mr. Susewind:

Please accept the enclosed preliminary comments from the Northwest Indian Fisheries Commission (NWIFC) on the Department of Ecology's current proposal for updating its water quality assessment method, Policy 1-11. NWIFC's twenty member tribes have constitutionally protected, treaty-reserved rights to harvest, consume, and manage fish and shellfish in their usual and accustomed areas. These preliminary comments are submitted to ensure protection of these and other reserved rights and resources, and to safeguard the health, livelihoods, and well-being of tribal members.

NWIFC appreciates Ecology's commitment to work closely with the tribes, in accordance with the co-management responsibilities shared by the state and the tribes; in furtherance of the Centennial Accord; and in line with the agreement *Cooperative Management of the Clean Water Act 303(d) Program for the Tribes in Washington State, the Washington State Department of Ecology, and the U.S. Environmental Protection Agency Region 10*. NWIFC understands that Ecology will be consulting with each tribe on a government-to-government basis as it shapes its final Policy 1-11 update and emphasizes the importance of such consultation.

NWIFC shares Ecology's interest in ensuring that water quality assessment in Washington is scientifically defensible and provides an accurate measure of impairment of the harvest "use" of Washington waters. We value Ecology's work to date toward this goal and offer these preliminary comments as a contribution to this effort. We look forward to continuing to work with Ecology on this and other facets of its water quality program – in our shared endeavor to ensure clean waters and healthy fish for everyone who depends on Washington waters.

Sincerely,

Justin R. Parker
Executive Director

Enclosures (5)