

EPA - Region 10

1. EPA recommends that the assessment units (AUs) indicated in Tables 1 and 2 be denoted in Figure 2 or another figure to visually show where all AUs addressed by the TMDLs are located. Additionally, the designated uses and applicable criteria in Tables 4 and 5 primarily reference upstream and downstream of Boulder Creek on the Pilchuck River, and without the AUs being identified in a figure or the water quality standards tables, it is difficult to discern what uses and criteria apply to all tributaries and AU segments; EPA requests that the document more clearly identify the uses and criteria applicable to each AU.
2. In the Targets discussion on p. 20, EPA requests that Ecology explain the basis for the surrogate targets/TMDLs. Although the potential factors influencing temperature and dissolved oxygen are discussed generally on p. 22/23 and in depth in Section 4 and Appendix F, the surrogate approach being used and its basis is not clearly presented.
3. Wasteload allocations for temperature, phosphorus, and biochemical oxygen demand are commonly referenced in the document as limits versus allocations. Because TMDL wasteload allocations must be incorporated into a permit before they are an enforceable limit and this terminology could be confusing, EPA recommends consistent usage of the term wasteload allocation.
4. In Chapter 2, Loading Capacity, please also include (or reference, if they are clearly identified elsewhere in the document) loading capacities for the tributaries for which temperature and dissolved oxygen TMDLs are being developed: Catherine Creek, Dubuque Creek, Little Pilchuck Creek and Unnamed Creek. Although Unnamed Creek is not impaired for temperature, if there is a thermal loading capacity that Ecology has identified is needed to address the dissolved oxygen impairment, that should be identified. Additionally, please identify the listing ID(s) and impairment addressed by each TMDL/loading capacity.
5. The target and allocation for effective shade is not presented consistently within the document. EPA's understanding matches with most of the references in the document, which describe the allocation as being site potential vegetation on the entire length of the tributaries. However, in the load allocation discussion on p. 177 (2nd and 3rd paragraphs), Ecology notes shade allocations have been established for the lower two miles of each tributary, and the temperature target discussion on p. 20 implies allocation to natural conditions is only in certain places where it says effective shade is "Assigned to specific river reaches to measure implementation progress and site-specific compliance."
6. If Figure 56 also illustrates the effective shade for the tributaries, please indicate that in the title of the Figure, and in the text (where appropriate). If Figure 56 does not indicate the effective shade for the tributaries, EPA requests those be identified.
7. It appears that several assumptions associated with the wasteload allocations, including the reserve wasteload allocation, are described in Section 4 but not included or referenced in Section 2 where the wasteload allocation tables and requirements are presented. EPA requests that all associated assumptions regarding wasteload allocations be included or referenced in Section 2.