

Klickitat County

Thank you for the opportunity to comment on the Salmon Spawning Habitat Protection Rule.

Klickitat County wishes to provide comment on the new dissolved oxygen (DO) criteria and their implementation in future Water Quality Assessments. We hope these comments will be considered both in the finalization of this rule and as the Department of Ecology (Ecology) prepares updates to the DO impairment listing methodology in Water Quality Program Policy 1-11.

We appreciate that multiple parameters will be available to demonstrate compliance with the more stringent DO criteria, including water column DO, oxygen saturation, and intragravel DO. This is helpful to local jurisdictions in multiple ways. It will help prevent unwarranted 303-d DO listings by accounting for environmental and site-specific conditions that affect DO levels, and help us better understand the cause of DO impairments (e.g. temperature vs. nutrients) and develop appropriate management responses.

However, we request that historical water column DO measurements not be used to determine impairment under the new, more stringent water quality standards. The new rule provides multiple criteria to demonstrate compliance, while the old rule utilizes only water column DO, which Ecology has recognized does not account for the influence of temperature or elevation, or account for site-specific conditions in spawning gravels. Carrying old DO water column measurements forward and applying them under the new, more stringent criteria could result in 303-d DO listings that are unwarranted. Rather, we request that Ecology utilize only new measurements that evaluate multiple DO criteria to determine DO impairment.

Should Ecology choose to carry forward historical measurements, we request that Ecology allow local jurisdictions time to conduct additional DO sampling in advance of the next Water Quality Assessment. It will be important to collect oxygen saturation and/or intragravel DO measurements to determine whether 303-d listing is warranted. This applies both to waterbodies previously categorized as Category 5 for DO impairment and those at risk of 303-d listing under the more stringent criteria (e.g. Category 2 waterbodies). We request time to complete this supplemental sampling, and where possible, Ecology's technical and/or financial assistance for sampling to ensure that unwarranted 303-d DO listings are not advanced.