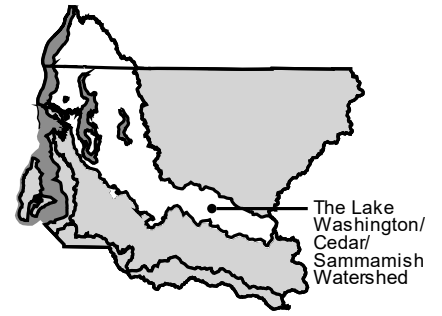


WATER RESOURCE INVENTORY AREA (WRIA 8) SALMON RECOVERY COUNCIL



May 7, 2024

Marla Koberstein
Department of Ecology
Water Quality Program
PO Box 47696
Olympia, WA 98504-7696



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Sno-King Watershed Council
Trout Unlimited
US Army Corps of Engineers
Washington Departments:
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Fish and Wildlife
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Washington Association of
Sewer and Water Districts
Washington Policy Center

Subject: Comments on Washington Department of Ecology proposed rulemaking revisions updating aquatic life criteria for Water Quality Standards for Surface Waters of the State of Washington

Dear Ms. Koberstein,

On behalf of the Lake Washington/Cedar/Sammamish Watershed (WRIA 8) Salmon Recovery Council, please accept this letter of support for the Department of Ecology's proposed update to aquatic life criteria for Water Quality Standards for Surface Waters of the State of Washington (WAC 173-201A-240), specifically regarding the toxic chemical 6PPD-quinone (6PPD-q).

Research shows that 6PPD-q is ubiquitous in roadway runoff samples in urban areas around Puget Sound. Rain washes 6PPD-q into streams and other receiving waters at concentrations lethal to coho salmon and steelhead/rainbow trout. The Lake Washington/Cedar/Sammamish Watershed is a heavily urbanized watershed where toxic synthetic chemicals and stormwater discharge are a priority concern given the impacts on salmonid health and survival.

WRIA 8 is the local salmon recovery Lead Entity, working to implement the WRIA 8 Chinook Salmon Conservation Plan including recovery actions to meet habitat goals that support long-term, sustainable, and harvestable Chinook salmon runs in the watershed. Our membership is comprised of 29 local government partners, and representatives from state and federal agencies, non-profit organizations, and other stakeholders with an interest in salmon recovery and watershed health. Improving water quality is one of WRIA 8's 20 high priority strategies for Chinook salmon recovery and provides substantial benefits to other aquatic species, like coho salmon. Key to the success of this strategy is integrating best available science on salmon habitat needs into water quality planning and rulemaking. Given the very high acute toxicity of 6PPD-q to coho salmon, we strongly support using EPA's 5th percentile of the species sensitivity distribution method to set criteria. A freshwater acute criterion of 8 ng/L will ensure coho salmon and other aquatic life are protected. This level of protection is vital to supporting salmon survival and overall watershed health objectives.

Thank you for the opportunity to comment on the proposed 6PPD-q water quality criteria. We support the more protective criterion proposed at 8 ng/L based on the best available toxicity data, as well as any refinements that may result in the completion of formal ESA consultation. We also acknowledge more work is needed to better understand the risks 6PPD-q pose to salmon including the need for toxicity information across life stages. WRIA 8 recommends revisiting the criteria as new science becomes available. We will continue to track water quality standards recommended by EPA and Ecology in this rulemaking process.

Sincerely,

John Stokes
Chair, WRIA 8 Salmon Recovery Council
Councilmember, City of Bellevue

Vanessa Kritzer
Vice-Chair, WRIA 8 Salmon Recovery Council
Council President, City of Redmond