



Snohomish Basin Salmon Recovery Technical Committee

To: Washington State Department of Ecology, Attn: Marla Koberstein

Re: Washington Department of Ecology proposed rulemaking revisions updating aquatic life criteria for Water Quality Standards for Surface Waters of the State of Washington, as related to Chinook Salmon in the Snohomish River and greater Puget Sound

To Ms. Koberstein,

Thank you for the opportunity to comment on the proposed update to aquatic life criteria for Water Quality Standards for Surface Waters of the State of Washington (WAC 173-201A-240).

We are writing on behalf of the Snohomish Basin Salmon Recovery Technical Committee (SBSRTC). For over 20 years, SBSRTC has worked to provide scientific support for protection and enhancement of the abundance, productivity, diversity, and spatial structure of all salmonid populations in the Snohomish River Basin. SBSRTC is an independent, self-guiding, and self-directing body that works in parallel with, and in support of, the Snohomish Basin Salmon Recovery Forum and the Snohomish Basin Lead Entity. We are made up of member organizations including Tribes, Federal and State agencies, cities, counties, and NGOs.

Recent scientific research shows that the tire chemical derivative 6PPD-q, originating from roadway runoff, is lethal to coho salmon and steelhead/rainbow trout. The Snohomish Basin is home to the Puget Sound's largest population of coho and protecting them is a priority for our watershed partners. Healthy populations of coho and other salmon species are vital to maintaining tribal sovereign and treaty rights and as a food source for many species, including critically endangered Southern Resident Killer Whales. *Given the very high acute toxicity of 6PPD-q to coho salmon, our committee strongly supports using EPA's 5th percentile of the species sensitivity distribution method to set criteria in order to protect coho salmon and other aquatic life so important to our basin and watershed partners.* We support this more protective freshwater acute 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. Along with the rest of the Snohomish Basin Salmon Recovery Technical Committee, we will continue to track water quality standards recommended by EPA and Ecology in this rulemaking process.

Sincerely,

Stuart Baker
Senior Habitat Specialist,
Snohomish County

Norah Kates
WRIA 7 Technical Coordinator,
King County

Matt Pouley
Restoration Biologist,
Tulalip Tribes