



May 7, 2024

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

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 Sammamish Kokanee Work Group (KWG), 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).

Urban areas surrounding Puget Sound are polluted with 6PPD-q and research finds 6PPD-q is very common in roadway runoff. Rain washes 6PPD into streams and other receiving waters where the chemical degrades into 6PPD-q which research has linked to mass deaths of coho salmon in the Pacific Northwest. Even small doses of 6PPD-q can be lethal to coho salmon, as well as steelhead and rainbow trout. The Lake Washington Basin which includes Lake Sammamish is a heavily urbanized watershed where toxic chemicals and stormwater discharge are a priority concern for salmon health and survival.

The KWG is a community partnership of elected officials, residents, tribal representatives, natural resource management agencies, municipalities, and conservation organizations. The goal of the KWG is to prevent the extinction and improve the health of the native kokanee population such that it is viable and self-sustaining, and then supports fishery opportunities. Since 2007, the KWG has worked hard to restore habitat, improve water quality, protect land, and bolster the wild kokanee population. Kokanee salmon spend their whole lives in freshwater, which is why water quality in Lake Sammamish and the surrounding kokanee spawning streams is so important.

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 should help ensure coho salmon and other aquatic life are protected. This level of protection is vital to supporting salmon survival, supporting watershed health objectives, and honoring tribal rights. We hope that as scientific discovery continues to evaluate sublethal effects as well as impacts to additional salmon species, including kokanee salmon, these criteria may be adaptively managed over time.

Thank you for the opportunity to comment on the proposed revisions to aquatic life criteria for state water quality standards. We support the protective criterion proposed at 8 ng/L based on the available toxicity data, as well as any refinements that may result in the completion of formal ESA consultation. We look forward to staying informed of the rulemaking process to adopt updated water quality standards.

Sincerely,

Alison Agness
Kokanee Salmon Recovery Manager, King County



Current representative list of entities active in the Kokanee Work Group:

Watershed residents

Trout Unlimited

Friends of Lake Sammamish State Park

Save Lake Sammamish

Friends of Pine Lake

Friends of the Issaquah Salmon Hatchery

Mountains to Sound Greenway Trust

Mid-Sound Fisheries Enhancement Group

Washington Sensible Shorelines Association

AmeriCorps

University of Washington

Washington State Parks and Recreation Commission

Washington Department of Fish and Wildlife

Washington Department of Ecology

US Fish and Wildlife Service

Snoqualmie Indian Tribe

City of Bellevue

City of Issaquah

City of Redmond

City of Sammamish

King County