



**King County**

Department of Natural Resources and Parks

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May 21, 2025

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

RE: King County comments on the Performance-Based Approach for Developing Site-Specific Natural Conditions Criteria for Aquatic Life in Washington

Dear Ms. Koberstein:

Thank you for the opportunity to submit comments on the draft document: *A Performance-Based Approach for Developing Site-Specific Natural Conditions Criteria for Aquatic Life in Washington*. King County appreciates the Department of Ecology's considerable effort to develop the methods document for establishing site-specific natural conditions for marine dissolved oxygen. Attached are specific comments we offer to further improve the Performance Based Approach.


Most importantly, we urge Ecology to include in the dissolved oxygen criteria the full range of natural variability of habitat and species in Puget Sound, as was done in Chesapeake Bay. Ecologists increasingly recognize that habitats are not static or homogeneous. Rather, they are usually dynamic patch mosaics that vary across space and time, and habitat variability can be as important as their average or mean condition. Incorporating natural variability would significantly improve the approach to the water quality standards and better ensure that subsequent regulatory requirements and management actions will yield better environmental outcomes.

We appreciate your consideration of these comments and would welcome the opportunity to further discuss this important work. If you have questions or need more information, please contact Jacque Klug, Wastewater Treatment Division Nutrient Management Coordinator at [Jacque.Klug@kingcounty.gov](mailto:Jacque.Klug@kingcounty.gov) or (206) 477-4474.

Sincerely,

Signed by:  


8F7ECDE169354C2  
Kamaron Gurrol, Division Director  
Wastewater Treatment Division  
Department of Natural Resources and Parks

Signed by:  


8D7AF316BF0B4B6  
Josh Baldi, Division Director  
Water and Land Resources Division  
Department of Natural Resources and Parks

Attachment

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Director's Office – Suite 6100 | Wastewater Division – Suite 6200 | Water and Land Division – Suite 6300  
Solid Waste Division – Suite 6400 | Parks Division – Suite 6500

**201 South Jackson Street, Seattle, WA 98104 | [www.kingcounty.gov/dept/dnrp](http://www.kingcounty.gov/dept/dnrp)**