



Public Works // Martin Pastucha, Administrator

October 20, 2025

Cleo Neculae
Washington State Department of Ecology
Water Quality Program
P.O. Box 330316
Shoreline, WA 98133-9716

Subject: Renton's comments on the Soos Creek Total Maximum Daily Load (TMDL) for Fine Sediments

Dear Ms. Neculae,

Thank you for the opportunity to provide comments on the Soos Creek TMDL for fine sediments. While the City of Renton remains committed to protecting and improving water quality to support the health of our water resources, as stated in our comprehensive plan and the Surface Water Utility System plan, Renton Surface Water Engineering (SWE) has multiple concerns about the proposed TMDL and impact to its operations, capital investment strategy, and growth management.

Implementation Strategy

The 40-year implementation period from 2026 to 2066 does not include any checkpoints to assess the impact of specifying Waste Load Allocations (WLAs) of fine sediment to cities within the Soos Creek Watershed onto Benthic Index of Biotic Integrity (B-IBI) scores. With the extensive resources and commitments required by jurisdictions within the Soos Creek watershed, it would be prudent to assess the approach adopted in this TMDL at specific intervals. Given that, in addition to B-IBI, Soos Creek is impaired in Temperature and Dissolved Oxygen, it not certain that this TMDL alone would result in the desired improvement in the biological health of Soos Creek. Additionally, the concerns brought forth below regarding the data and modeling based on which the TMDL was developed, further corroborate the need for a measured and prudent implementation approach with reasonable targets.

Model Data and Correlation between B-IBI and Total Suspended Solids (TSS)

The lack of conclusive evidence demonstrating that a reduction in TSS concentration from the municipal storm system results-in an improvement in B-IBI reduces the credibility of this TMDL. Flow alteration is the largest contributor (60%) to the variation in B-IBI scores, but flow alteration is not considered a pollutant "subject to TMDLs under the Clean Water Act" as stated in the TMDL. This TMDL is written for fine sediment

- one of three stressors (the others being flow alteration and habitat degradation). If all parties were to meet their targets for the fine sediment TMDL, B-IBI scores may not see great improvement because flow alteration is the major unregulated factor. Also, studies that show the relationship between fine sediments and B-IBI should be local to Washington state and peer-reviewed in reputable publications to ensure that the TMDL is science-based. A reduction in fine sediment to improve B-IBI is the fundamental premise behind the TMDL. However, as stated by Ecology during prior meetings, no fine sediment TMDL has yet been utilized to result in an improvement in B-IBI. It would be prudent to test this approach on a small-scale watershed first before implementing it on a 66-square mile watershed extending across multiple jurisdictions and requiring these jurisdictions to spend potentially billions of dollars collectively. This concern is corroborated by the seemingly inverse correlation between B-IBI measurements and fine sediment levels in the lower reaches of the watershed. The TMDL, specifically in Figure 6, shows that B-IBI scores are generally better closer to the downstream end of the watershed, which is also the area modeled to be most impacted by fine sediment. This suggests that fine sediment may not be the primary cause of lower B-IBI scores, and casts major doubt, as previously stated, onto the basis on which this TMDL was developed.

Furthermore, the foundational data used to calibrate the fine sediment model is too sparse, with only four sampling sites (none of which are in Renton) used across a watershed over sixty-six square miles. Renton SWE also supports the position taken by the City of Kent's Environmental Engineering Section that making accurate model calibration and extrapolation based on such sparse sample is not likely, if not impossible. The scarcity of initial calibration data also means that if water quality standards are not met, the permittees and Ecology will not be able to determine if the initial allocations are the reason for the failure. Additionally, the data is over a decade old, rendering it obsolete due to significant changes from recent stormwater projects and best management practices.

Margin of Safety

The explanation for using an implicit approach to the margin of safety on page E-2 does not align with the discussion on pg. 119 in Mohamedali (2024) which states that "The margin of safety for this TMDL can be implicit, particularly because the loading capacity in each flow interval is expressed as a range (based on the interquartile range of TSS concentrations in each flow interval), and this range is below the highest estimated TSS concentrations for each flow interval." It is unclear if the implicit approach used "because the loading capacity in each flow interval is expressed as a range" (which is no longer the case since the TMDL uses median) or because the "calculation of the TMDL uses conservative assumptions" as stated on page 65 of TMDL. Additional clarity regarding the margin of safety is desired.

Impact to compliance with other regulatory requirements

Renton prioritized the Johns Creek subbasin and developed a Stormwater Management Action Plan (SMAP) to reduce pollutant discharge to Johns Creek as required by the 2019-2024 Phase II Municipal Stormwater General Permit. Requiring flow control and water quality stormwater retrofits across the entire Soos Creek



subbasin within Renton will strain the limited resources available to deliver the capital projects and operational best management practices listed in the SMAP. Additionally, the retrofits required by the proposed TMDL may require significant property acquisitions to construct flow control facilities and thus pose a challenge towards meeting growth management and affordable housing regulations and priorities.

Lastly, Renton SWE supports the concerns made by the City of Kent Environmental Engineering section in their comment letter regarding the infeasibility of the targets set in the TMDL. The TMDL sets an extreme and potentially financially infeasible target, requiring all land uses to mimic the TSS loadings and hydrology of a pre-developed, natural forested condition. The financial commitment to achieve that may not be possible for Renton. Renton SWE requests the consideration and modeling of less aggressive percentages of forested conditions (e.g. 60-70-80%) to determine if a reduced and more achievable percentage is sufficient in largely achieving the desired improvements in B-IBI. The historic conditions in the Soos Creek Watershed likely were not 100% forested.

Enhancing water quality and protecting our local watersheds is a key component of the Renton Surface Water program. Nevertheless, we strongly recommend that Ecology revise the Soos Creek TMDL to fully address the validity of the underlying analysis, the prioritization of fine sediment, and the massive resource and financial impacts on local agencies. We welcome further collaboration to ensure the final TMDL is both practical and successful for every impacted jurisdiction.

Sincerely,



Joe Farah
Surface Water Engineering Manager

