



**REGION 10**  
SEATTLE, WA 98101

October 20, 2025

Ms. Cleo Neculae  
Washington Department of Ecology  
Water Quality Program  
PO Box 330316  
Shoreline, WA 98133

Dear Ms. Neculae:

The U.S. Environmental Protection Agency has reviewed the Washington Department of Ecology's Soos Creek Watershed Fine Sediment Total Maximum Daily Load, which was released for public comment from September 17, 2025, to October 20, 2025. The EPA's main comment on the TMDL document, Implementation Plan and associated appendices is listed below.

1. **Scope (pg 16)** - The EPA's approval of TMDLs requires that the applicable assessment units reflect the current EPA approved integrated report. Washington's 2018 Integrated Report (IR) was approved by the EPA on August 26, 2022. However, Washington Department of Ecology submitted their 2022 IR to the EPA earlier this year, which is still awaiting final EPA action. The TMDL refers to the 2018 303(d) list when discussing listing status and impairments, but the draft TMDL reflects the draft 2022 IR assessment status for listing 97926 (e.g., Table 1 and last sentence of Scope, pg 16). We understand that listing 97926 in the draft 2022 IR is moved from Cat 5 to Cat 2 for fine sediments, but the most recent EPA approved IR is the 2018 IR. If Washington's 2022 IR is not approved by the date of TMDL submittal, the listing status of the assessment units in the TMDL should reflect (and reference) the latest EPA approved IR.

In addition to the above comment, the EPA has the following recommendations for improved clarity:

2. **Future Impairment Listings (pg 21)** – The TMDL states that the first step for moving new Cat 5 listings to 4a would be based on new B-IBI and FSBI data entered in Ecology's EIM. However, it is conceivable that other data types could be used to identify a fine sediment impairment. If Ecology intends for this TMDL to cover any future fine sediment impairments, then Step 1 should be revised.
3. **Load Allocations (pg 63) and Appendix E (pg E-13)** - "Similar to the WLA calculations, the LAs are estimated based on median TSS loadings within each flow interval modeled for each subbasin, which are distributed proportionally using the nonpoint surface areas in each subbasin (Figure 9)." As part of Table 25 - TSS Load Allocations, a note is provided with the

surface area acreage broken down by subbasin and it is mentioned “these [values] can be used to calculate the normalized LA for smaller areas within each subbasin.” The approach to conducting the LA calculations could be more clearly laid out between the TMDL Load Allocations Section and Appendix E where TMDL calculations are discussed, but there is limited explanation. For example, consider including a table with the subbasin acreage and including an example calculation for one of the load allocations in Appendix E for clarity.

We appreciate Ecology’s extensive work on this TMDL and the opportunity to work together as Ecology finalizes the TMDL package. If you have any questions about the submitted comments, you can contact me at 206-553-4689 or [Clark.Sydney@epa.gov](mailto:Clark.Sydney@epa.gov).

Sincerely,

Sydney Clark  
Water Division