

Covington (Ben Parrish)



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

Subject: 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 draft of the Soos Creek TMDL for Fine Sediments. The City of Covington is committed to protecting and improving the water quality of our streams to support aquatic ecosystems and enhance the quality of life for our citizens. For 28 years the City of Covington has strived to foster responsible development that protects our streams and wetlands and provides full manual compliant stormwater infrastructure. The city has fully implemented all aspects of the NPDES Permit and we have seen a dramatic improvement in the watershed because of the work we have done and will continue to do. After reviewing the draft of the Soos Creek TMDL for Fine Sediments, the City of Covington has multiple concerns about the proposed TMDL and the impact it will have on our ability to continue the work we are already doing in the Soos Creek Basin.

Modeling Data

The City of Covington does not have staff members with adequate scientific background to argue the science behind the proposed TMDL, but we want to make note of some concerns with the scientific approach that was used by Ecology to create this TMDL. With the fundamental premise behind the TMDL being Stormwater = TSS in streams, the city feels that there is lack of conclusive evidence demonstrating that a reduction in TSS concentration from the municipal storm system will result in an improvement in BIBI with ecology staff admitting in a public meeting that no fine sediment TMDL has yet been utilized to result in an improvement in BIBI. If TSS is an issue in the Soos Creek Basin, then the TMDL should be based on actual TSS data that can be easily measured to show implementation success and not BIBI which is affected by many factors beyond stormwater inputs and may never meet TMDL targets.

Soos Creek Basin

The TMDL seems to lack an understanding of the watershed and the work that has been done in the basin with BIBI scores improving since the start of NPDES implementation in the area. The choice to use simulated forest conditions in the HSPF model and for new and re

development modeling is problematic with historical data that supports that presents of prairie land and large wetland complexes throughout the watershed most of which were location in the greater Covington area. The TMDL characterizes the entire 66 square mile Soos Creek Basin based on only a hand full of sites. The Soos Creek Basin is a diverse system with natural steep slopes, large instream wetlands, peat bogs, ground water inputs, deep channelized ravines, and low gradients flood plains. All these natural factors will impact BIBI scores and stormwater retrofits will not fix the natural processes that can impact the basin.

Implementation

The Implementation of this TMDL will put a heavy burden on the resources of all the jurisdiction in the Soos Creek Watershed. The implementation strategies that are proposed in this TMDL are costly, time-consuming and will take resources away from other programs that serve our communities. While on paper, the implements strategies seem like Jurisdictions will simply have to continue to implement the NPDES permit to comply with TMDL. In meetings with Ecology Staff, it has become clear that NPDES compliance was not enough and the expectation is full stormwater system retrofit to current standards (which is a moving target as standards are updated) and stream channel/riparian restoration to meet the BIBI targets which may never be achieved. Implementation strategies in the TMDL are left as suggestions, but it seems like they will all be required in the end to meet the TMDL. There is a general lack of information on what implementation will look like and how it will be measured, and Ecology's response so far has been to deal with it later in the next NPDES Permit. When implementation is not clear and upfront, it allows for targets to move and/or expand and can create a lack of trust with Ecology. Additionally, some of the strategies like adopting the Fish and Wildlife potential tree height riparian buffers and modeling new and redevelopment to predeveloped forested conditions is in direct conflict with the Growth Management Act, and Jurisdictions' legal requirements to meet housing targets set by the State.

Conclusion

The City of Covington remains committed to the health of the Soos Creek Basin. We are also committed to supporting our neighboring jurisdictions and we strongly recommend that Ecology revise the Soos Creek TMDL to fully address the valid comments submitted by us and by the other jurisdictions in the watershed.

Sincerely,

Ben Parrish

Surface Water Manager

City of Covington