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I have reviewed the Fine Sediment TMDL plan for the Soos Creek basin and have the following comments.

It would help immensely if major roads were added to Figure 2.

p. 17 Please list ALL Impairment categories with a brief explanation of what each means.

The report takes considerable effort to justify the use Of TSS as a reasonable surrogate for fine sediment. But that begs the question. Nowhere in the report did I find a definition or description of what constitutes fine sediment. Is fine sediment merely TSS that has settled onto the stream bottom? Seeing that fine sediment is the very pollutant that this report purports to control, a clear definition somewhere in the report would seem to be fundamental.

The numbers in Table 26 do not track with those in Table 7 (Maple Valley, Renton, King County).

p. 68 The timeframe chosen for full TMDL control and attainment of water quality standards is 40 years (2065). This seems like an extraordinarily LONG timeframe. How was this timeframe arrived at?

pp. 75-76 The discussion of the permit rqts. for the two surface water point sources does not mention whether or not both of those sources are currently in compliance, or not. Since this a fundamental assumption for the attainment of long-range of water quality standards, it would be nice to know if current monitoring shows that these sources are indeed meeting permit rqts.

p.90 A simple diagram showing the three riparian buffer zones would be very helpful in understanding the text shown in Table 31.

My most significant comment is as follows:

It is made clear that that the municipal (and related) stormwater permit updates will be one of the the primary drivers for implementing the requirements emanating from the TMDL. What puzzles me is the lack of any schedule for actual implementation other than full implementation by 2065. A major portion of the total development in the Soos Creek Basin predates the requirement for stormwater control. Most of these areas will need to be retro-fitted with BMPs. But nothing in the report indicates any kind of timetable for retrofitting. In theory, the individual jurisdictions could wait 30 or more years before initiating any meaningful retrofits. In the absence of any substantial retrofits in the Soos Creek Basin, the periodic monitoring called for the in the Plan is unlikely to provide a good indication as to true BMP effectiveness, let alone serve as a reliable guide for Adaptive Management.