

November 17, 2025

Public Comment: Ninth Annual TMDL Prioritization Webinar (Presented October 23, 2025)

ATTN: The Department of Ecology (Ecology) Water Quality Program

The [Interagency Team](#) (IAT) appreciates the complexities involved in prioritizing important work and applying the criteria in Ecology's TMDL prioritization process, as outlined in Water Quality Policy 1-11 (WQP 1-11). As stated in WQP 1-11, "Ecology recognizes that partnerships at the local level are essential for ensuring successful TMDL implementation." The same is true for alternative water cleanup plans such as pollution control programs (Category 4b) or advance restoration plans (ARPs).

The IAT believes there are opportunities to improve transparency and partnership engagement in the earliest stages of Ecology's prioritization process. If considered early in the planning process, local knowledge, data, and water quality clean-up priorities can further inform Ecology's work in formulating TMDL and water cleanup plan development priorities.

The IAT would like to reiterate some of the recommendations in the [TMDL Ad Hoc White Paper](#) most relevant to the Ecology's prioritization process. We thank Ecology for incorporating several white paper recommendations, and believe outcomes can further be improved by adding clarity in foundational processes by incorporating these recommendations:

Recommendation: To provide greater insights in identifying opportunities for early collaboration, add clarity to WQP 1-11 explaining the different roles and responsibilities within Ecology from TMDL (and alternative water cleanup plan) prioritization through development, permitting, implementation, and effectiveness evaluation.

Recommendation: Provide earlier opportunities for partner engagement and involvement to help inform TMDL (and alternative water cleanup plan) development priorities.

Recommendation: To support clean water goals, continue to add process clarity to WQP 1-11 about the various alternative water cleanup pathways.

We appreciate that WQP 1-11 is not currently being updated but look forward to any opportunity to collaborate further.

Thank you,

The Interagency Team