



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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September 28, 2015

Mr. Dan Opalski, Director
Office of Water and Watersheds
U.S. EPA Region 10
1200 6th Avenue
Seattle, WA 98101

Dear Mr. Opalski:

The Department of Ecology is submitting Washington State's 2014 Water Quality Assessment (WQA) and candidate 303(d) List to EPA as an "integrated report" to meet the Clean Water Act requirements of sections 305(b) and 303(d). Information on the 2014 Assessment may be found at <http://www.ecy.wa.gov/programs/wq/303d/currentassessmt.html>.

Throughout this process, we worked closely with your staff to make sure we adequately responded to the questions and clarifications that EPA needs in order to approve the candidate 303(d) list. We especially want to note the work of Jill Fullagar and David Croxton to ensure our assessment meets EPA requirements and policy needs. The following items are a part of our submittal package:

1. Compact Disk (CD) with an ACCESS file of the 5 categories of the WQA
2. A GIS shapefile that has the geometry of listings for Categories 1, 2, 4, and 5
3. A crosswalk spreadsheet to account for delistings/changes from previous impaired category listings, and any inactivations due to NHD changes or other reasons.
4. Call for data - Documentation of the public process:
 - a. Public workshops
 - b. Targeted solicitations for data
5. Water Quality Policy 1-11 Revisions:
 - a. Public Review
 - b. Responsiveness summary
6. Data sources Considered in the Assessment
7. 2014 Draft WQA:
 - a. Public Review and Workshops
 - b. Responsiveness Summary



8. Tribal review and consultation
9. Prioritization of TMDLs
10. Other Information:
 - a. Category 4B Analyses for Fresh Water Listings
 - b. Rationale for Bioassessment Listings using B-IBI

Ecology notes in particular that we have included additional rationale in Enclosure 10 for the 2014 WQA submittal to EPA regarding Benthic-Index of Biotic Integrity (B-IBI) thresholds used for assessment of B-IBI data. EPA has strongly encouraged Ecology in previous assessments to use B-IBI data for assessment purposes. At the time that Water Quality Policy 1-11 was revised in 2012, threshold scores were not provided for B-IBI data because an adequate dataset was not available to determine category thresholds. As assessment of data for the 2014 WQA began, Ecology noted that there had been an increase in the volume of benthic data available in the region, and most of the entities collecting this data were using it to develop B-IBI model scores. Ecology recognized, after Policy 1-11 was updated in 2012 and the WQA was in progress, that it was necessary to establish a statistical set of B-IBI thresholds for the draft 2014 WQA in order to produce consistent listing decisions regardless of the data submitter. The rationale document in Enclosure 10 explains the steps that were taken to establish B-IBI thresholds for use in this WQA.

During public review of the WQA Ecology received numerous comments on bioassessment listings, as well as concerns about what Category 5 listings will mean for regulated stormwater discharges, and how TMDLs will be conducted without identification of a pollutant to establish load allocations. For the next WQA, Ecology has committed to convening a transparent and public multi-stakeholder and tribal group effort to further develop bioassessment impairment definitions as revisions are considered in Policy 1-11, including discussion on how bioassessment listings will be addressed in TMDLs and other Water Quality Programs as we move forward. We encourage EPA to be an active participant in this collaborative process.

We look forward to your approval of the 2014 Water Quality Assessment and candidate 303(d) List. As soon as approval is granted, our program will initiate the next Assessment process, starting with a call-for-data anticipated in Spring 2016. Please contact Patrick Lizon at: patrick.lizon@ecy.wa.gov or (360) 407-6782 if you have any questions, or would like additional assistance orienting you and your staff to this information.

Sincerely,



Heather R. Bartlett
Water Quality Program Manager

Enclosures