



May 15, 2015

Patrick Lizon
Water Quality Assessment Coordinator
Washington State Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

RE: Bellevue Comments for the 2015 Proposed Water Quality Assessment and 303(d) List for Washington State Using Fresh Water Data

Dear Mr. Lizon:

Thank you for the opportunity to comment on the "2015 Proposed Water Quality Assessment (WQA) and 303(d) List for Washington State Using Fresh Water Data."

Enclosed please find Bellevue's comments. We have included recommended changes to address concerns with the WQA and proposed 303(d) List as well as the Total Maximum Daily Loads (TMDLs) developed as a result of the 303(d) List.

Bellevue would welcome the opportunity to discuss these comments further with you. If additional information is needed or you have questions about the comments, please contact Phyllis Varner at 425-452-7683 or pvarner@bellevuewa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Paul A. Bucich".

Paul Bucich
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Bellevue Comments and Recommendations for the 2015 Proposed Water Quality Assessment and 303(d) List for WA Using Fresh Water Data

The Proposed 303(d) List - Bioassessment Listings

Background

The Clean Water Act's 303(d) List (also referred to as Category 5 in Ecology's Integrated Report) is supposed to list waterbody segments impaired by pollutants and requiring development of a TMDL (total maximum daily load). A TMDL is a calculation of the maximum amount of a *pollutant* that a waterbody can receive and still meet water quality standards. The TMDL results in a water quality improvement plan containing implementation actions, some of which become requirements in municipalities' NPDES stormwater permits.

Comment

On the proposed 2015 303(d) List, there are ninety-two waterbody listings based on bioassessment (Attachment A). Bioassessments are not pollutants; there is no water quality standard for them. A TMDL cannot be developed for a bioassessment.

For the bioassessment listings contained in a previous Integrated Report, Ecology noted (in the listing remarks section) that the listings were "initially placed in Category 4c for biological data (Segment is Impaired by a Non-Pollutant) in accordance with Policy 1-11. Then, moved listings to Category 2 (Segment is a Water of Concern) based on recommendations from EPA, *since the data is insufficient to determine if the biological impairment is from a pollutant or pollution* (emphasis added). Additional monitoring needs to occur before the sources of impairment can be identified." Note, the term "pollution" as used here refers to non-pollutants.

Recommendation on Bioassessment Listings

Bellevue recommends that the proposed ninety-two 303(d) waterbody listings for bioassessment be placed in Category 2 (Segment is a Water of Concern) because the source of the biological impairment has not been identified and the CWA's 303(d) List is a list for waterbodies whose impairment is caused by a pollutant and requires a TMDL. Additional monitoring can determine the cause of the bioassessment impairment, at which point the waterbody can be moved from Category 2 to the appropriate category, either 4c or the 303(d) List (Category 5). Also see related comments and recommendations below.

The Proposed 303(d) List - Non-Pollutants

Background

Recently, at an Ecology public meeting (April 9, 2015) on the 2015 Proposed Water Quality Assessment (WQA) and 303(d) List for Washington State Using Fresh Water Data, there was

discussion that the next step for a bioassessment listed segment would involve conducting a stressor identification study *to determine if a specific causal pollutant can be identified* (emphasis added).

In the 2012 WQ Policy 1-11 Revisions-Response to Comments document, Ecology says (pg. 35):

“...a stressor identification study must be conducted *prior to development of a TMDL* (emphasis added). The stressor ID study will determine if there is a pollutant that can be addressed by a TMDL or if we need to come up with some other suggestion for restoration, which would place the listing in Category 4c (Segment is Impaired by a Non-Pollutant).”

Ecology staff identified the Soos Creeks Multi-Parameter TMDL as an example in which a stressor identification study had been conducted. Review of the information on Ecology’s website for the TMDL (<http://www.ecy.wa.gov/programs/wq/tmdl/SoosCrTMDL.html>) showed that, after the study, aquatic habitat, a non-pollutant, had been added as a parameter for TMDL development, as noted below.

Status:

Aquatic Habitat, Dissolved Oxygen, and Temperature project - TMDL under development
Fecal coliform project - TMDL under development

When contacted about this TMDL, Ecology staff said that since aquatic habitat is a non-pollutant, then the aquatic habitat impairment would be placed in Category 4c (Segment Impaired by a Non-Pollutant), consistent with 2012 WQ Policy 1-11 Revisions-Response to Comments. However, shortly thereafter, Ecology staff said that this was incorrect information and that the Soos Creeks TMDL was a “pilot project to write a TMDL for a non-pollutant.” Subsequently, Bellevue learned that other TMDLs may also be being written for non-pollutants; for example, the proposed Clarks Creek Area TMDL includes a TMDL for a non-pollutant, fine sediment (<http://www.ecy.wa.gov/programs/wq/tmdl/ClarksCrDOTmdl.html>).

Comment

Ecology’s approach of placing waterbodies on the 303(d) List before the source of the biological impairment has been determined is:

- Inconsistent with CWA 303(d) List requirement to list waterbodies impaired by pollutants;
- Misapplied and confusing as demonstrated in the examples discussed above;
- Directs limited resources away from developing TMDLs for pollutant-impaired waterbodies.
- Results in an inaccurate 303(d) list, requiring on-going administrative and tracking resources to “delist” or keep waterbodies on 303(d) List once the source of the biological impairment is known.

Recommendation on 303(d) Listing

Bellevue recommends that the 303(d) List only be used for bioassessment impairments where a *causal pollutant* has been identified and that bioassessment impaired waterbodies be listed in Category 2 (Segment is a Water of Concern) until a source or cause of the biological impairment has been identified. Waterbodies with bioassessment impairments caused by non-pollutants such as

aquatic habitat, stormwater flow, or whose condition is “likely not the result of pollutant sources” would be placed in Category 4c (Segments Impaired by a Non-Pollutant) consistent with current WQA Policy 1-11 direction.

Bellevue further requests Ecology update WQA Policy 1-11 to be more consistent with the above recommendations.

TMDLs - Non-Pollutants and Pollutant Surrogates

Background

Ecology appears to be developing TMDLs for non-pollutants as proposed in the Soos Creek Multi-Parameter (aquatic habitat) and Clarks Creek Area TMDLs noted in previous comments. In addition, Ecology appears to be proposing use of pollutant surrogates to establish targets for TMDL loading capacity in TMDL implementation requirements. For example, the:

- Lake Whatcom Phosphorus TMDL uses stormwater runoff as a pollutant surrogate for phosphorus and requires Whatcom County and Bellingham to meet the target of reducing stormwater runoff to forested predevelopment conditions for 87% of the current developed area in the watershed <https://fortress.wa.gov/ecy/publications/publications/1310012.pdf>;
- Clarks Creek Area TMDL uses stormwater runoff (flow) as a pollutant surrogate for dissolved oxygen and sets a target of reducing stormwater flow volume by 50% in the implementation plan <https://fortress.wa.gov/ecy/publications/publications/1410030.pdf>.

Both TMDLs are currently in Ecology’s informal dispute resolution process, initiated by affected municipalities.

Comment

Pollutant surrogates (or non-pollutants) are not pollutants. In January 2013, a federal court held that the Environmental Protection Agency (“EPA”) cannot regulate storm water flow in setting a TMDL for impaired waterbodies under the Clean Water Act. The court found that EPA can only issue TMDLs for actual pollutants, finding that “Stormwater runoff is not a pollutant, so EPA is not authorized to regulate it via TMDL.” EPA did not appeal this decision. Virginia DOT v. EPA http://www.accotink.org/Accotink_Case_Decision.pdf

Subsequently, in November 2014, EPA issued a new memorandum updating aspects of its November 2002 memorandum on the subject of “Establishing TMDL Wasteload Allocations (WLAs) for Storm Water Sources and NPDES Permit Requirements Based on Those WLAs” and replacing an earlier November 2010 update memorandum. Most significantly, in the new 2014 TMDL update memorandum, EPA removed all language related to using surrogates for pollutant parameters when establishing targets for TMDL loading capacity.

And, recently, the city of Rutland, Vermont filed a complaint on Feb. 18 asking the U.S. District Court to vacate an EPA-approved Moon Brook TMDL that uses stormwater runoff volume as a surrogate for sediment. (City of Rutland v. EPA, D. Vt., No. 15-00035, 2/18/15) <http://stormwater.wef.org/wp-content/uploads/2015/03/Moon-Brook-Complaint.pdf>.

Recommendation on Use of Pollutant Surrogates in TMDLs

Bellevue recommends Ecology discontinue the use of pollutant surrogates in TMDLs as they are not pollutants regulated by the Clean Water Act. Continuance of this practice by Ecology is counter to the federal court decision and national direction EPA is applying to the Clean Water Act's TMDL program.

Defining Bioassessment Impairment

Background

Ecology's Administrative Procedures Act, under RCW 34.05.272 Significant Agency Action, states that, before taking significant agency action, which may include technical assessments used to directly support implementation of a state rule or statute, Ecology must identify the sources of information as well as any scientific literature reviewed and relied upon and make these available on the agencies website.

Comment

BIBI and RIVPCAS scores can help inform and prioritize waterbodies for improvement and/or restoration activities. Bellevue and other municipalities can and do use bioassessment data to inform and prioritize their stream improvement and restoration activities. However, because bioassessment doesn't identify the stressors (pollutants or non-pollutant conditions) that are causing the biological conditions, the data can't be used to place waterbodies on the 303(d) List (Category 5) or in Category 4c (Segment Impaired by a Non-Pollutant); rather bioassessment data can be used to identify a Category 2 segment (Segment is a Water of Concern).

In Water Quality Policy 1-11, Ecology identifies state-wide bioassessment impairment definitions for use in water quality assessments, however, there isn't sufficient information to understand how these "impairment standards" were developed and the scientific basis and supporting documentation for them. There are multiple factors that influence the expected optimum benthic index for a site. Using a single number or rating of bioassessment impairment for the entire state may not represent the optimal or achievable condition for the local aquatic ecosystem.

Recommendation on Defining Bioassessment Impairment

Bellevue requests that Ecology provide a description of how they arrived at the definitions of bioassessment impairment included in WQP 1-11. This includes the peer reviewed or scientific literature used to support Ecology's determination that a BIBI score of <27 or a RIVPACS score of <0.73 over two concurrent years (where the data is less than 5 years old) identifies impairment. Alternatively or in support of Ecology's work to date to define bioassessment impairment in streams,

we request that a transparent and public multi-stakeholder group effort be convened to develop bioassessment impairment definitions for future use in identifying Category 2 waterbodies.

The 303(d) List – Proposed pH Listings for Lake Washington and Lake Sammamish

Comment

This comment is about the proposed new pH listings for Lake Washington and Lake Sammamish; for Bellevue, this includes listings #72026, #72036, and #72024.

Bellevue concurs with King County's comments and recommendation for the new lake pH listings:

“A number of segments in Lakes Washington and Sammamish and Lake Union/Ship Canal are proposed to change from Category 3 (Segment Lacks Sufficient Data) to Category 5 for pH. We have examined these data and they represent acute, transitory daily excursions. We believe this is a misapplication of the data which were used to categorize these waterbodies and that transitory pH fluctuations are due to natural conditions. Our long term trend analysis shows no change in trophic state index for any of these lakes which would corroborate a pH impairment decision. (<http://green2.kingcounty.gov/lakes/TSL.aspx>) Ecology WQP Policy 1-11 indicates natural conditions should be evaluated as part of the pH listing decision process; however, it does not appear these conditions were taken into account. Until these transient pH fluctuations can be identified as a cause of degradation to designated uses, or are demonstrated to be beyond range of natural conditions, we recommend these lakes be categorized at Category 2.”

Recommendation for Lakes Washington and Sammamish's New 303(d) Listings for pH

Bellevue recommends that the new pH listings be categorized at Category 2 (Segment is a Water of Concern) because the data represents acute, transitory daily excursions likely due to natural conditions. King County staff responsible for collecting and analyzing the lake data referenced in the listing and for conducting long term trend analysis for the lakes have not identified degradation or change in trophic state index for any of these lakes. This comment applies to all new 303(d) Listings for pH, including listings #72026, #72036, and #72024.

Category 4b Segment has a Pollution Control Program (in lieu of a TMDL)

Background

This category is intended to be used to address waterbodies impaired by a pollutant in which a local, state or federal authority is implementing a pollution control program (or sediment cleanup plan) and Ecology determines that the program or strategy is expected to result in the waterbody meeting water quality standards. If Ecology makes a favorable determination, then the stream segment is moved from Category 5 (the 303d List) to Category 4b. Kitsap County recently provided a presentation on a successful Category 4b bacteria pollution control program they implemented. It was difficult to assess challenges and widespread application of this tool from the Kitsap example because of what

appeared to be a somewhat unique relationship among the stakeholders responsible for addressing bacteria. There are 138 pollution control plans for pollutants (in water) listed in Category 4b. Resources spent to improve this tool could significantly increase its use. The Interagency Project Team's TMDL improvement recommendations include more thorough implementation of existing authorities to address unpermitted and non-point sources.

Comment

Bellevue thinks Category 4b, the "direct to implementation" approach, is an under-utilized tool by municipalities and Ecology. If Ecology were to direct resources to work with a multi-stakeholder workgroup and better identify the stakeholders and components necessary to develop a successful pollution control program, then we think this would result in municipalities choosing this option to target 303(d) listings, such as developing waterbody-specific plans for temperature and fecal coliforms currently on the 303(d) List. Taking this approach would result in resolution of known pollutant problems sooner.

Recommendation on Increasing Use of "Direct to Implementation" Tool (Category 4b)

Bellevue recommends Ecology convene a multi-stakeholder work group to develop guidance and identify the process necessary for municipalities and other agencies to create successful Category 4b pollution control programs.



Home Search Database Proposed WQ Assessment Map

92 Matched Listings

View	ListingID	Proposed Category	Medium	Parameter	Waterbody Name	WRIA	WQ Improvement Project	WQAtlas Map Link
View	18885	5	Other	Bioassessment	HYLEBOS CREEK	10 - Puyallup-White		18885
View	18886	5	Other	Bioassessment	WAPATO CREEK	10 - Puyallup-White		18886
View	18889	5	Other	Bioassessment	CHAMBERS CREEK	12 - Chambers-Clover		18889
View	19879	5	Other	Bioassessment	CALIFORNIA CREEK	1 - Nooksack		19879
View	22280	5	Other	Bioassessment	RACEHORSE CREEK	1 - Nooksack		22280
View	22283	5	Other	Bioassessment	SUMAS RIVER	1 - Nooksack		22283
View	22321	5	Water	Bioassessment	LITTLE BEAR CREEK	8 - Cedar-Sammamish		22321
View	40688	5	Water	Bioassessment	PEABODY CREEK	18 - Elwha-Dungeness		40688
View	42817	5	Water	Bioassessment	CASSALERY CREEK	18 - Elwha-Dungeness		42817
View	42902	5	Water	Bioassessment	ENNIS CREEK	18 - Elwha-Dungeness		42902
View	42962	5	Water	Bioassessment	BELL CREEK	18 - Elwha-Dungeness		42962
View	42964	5	Other	Bioassessment	BELL CREEK	18 - Elwha-Dungeness		42964
View	70006	5	Water	Bioassessment	COUGAR CANYON CREEK	28 - Salmon-Washougal		70006
View	70009	5	Water	Bioassessment	CURTIN CREEK	28 - Salmon-Washougal		70009
View	70012	5	Water	Bioassessment	GEE CREEK	27 - Lewis		70012
View	70021	5	Water	Bioassessment	MILL CREEK	28 - Salmon-Washougal		70021
View	70030	5	Water	Bioassessment	WHIPPLE CREEK	28 - Salmon-Washougal		70030
View	70040	5	Water	Bioassessment	DRY CREEK	18 - Elwha-Dungeness		70040
View	70072	5	Water	Bioassessment	BEAR CREEK	8 - Cedar-Sammamish		70072
View	70074	5	Water	Bioassessment	COTTAGE LAKE CREEK	8 - Cedar-Sammamish		70074
View	70077	5	Water	Bioassessment	UNNAMED CREEK (TRIB TO CEDAR RIVER)	8 - Cedar-Sammamish		70077
View	70078	5	Water	Bioassessment	MOLASSES CREEK	8 - Cedar-Sammamish		70078
View	70079	5	Water	Bioassessment	MADSEN CREEK, S.F.	8 - Cedar-Sammamish		70079
View	70085	5	Water	Bioassessment	UNNAMED CREEK (TRIB TO LAKE WASHINGTON)	8 - Cedar-Sammamish		70085
View	70086	5	Water	Bioassessment	UNNAMED CREEK (TRIB TO LAKE WASHINGTON)	8 - Cedar-Sammamish		70086

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92 Matched Listings

View	ListingID	Proposed Category	Medium	Parameter	Waterbody Name	WRIA	WQ Improvement Project	WQAtlas Map Link
View	70088	5	Water	Bioassessment	FORBES CREEK	8 - Cedar-Sammamish		70088
View	70089	5	Water	Bioassessment	KELSEY CREEK	8 - Cedar-Sammamish		70089
View	70090	5	Water	Bioassessment	UNNAMED CREEK (TRIB TO COAL CREEK)	8 - Cedar-Sammamish		70090
View	70091	5	Water	Bioassessment	UNNAMED CREEK (TRIB TO RICHARDS CREEK)	8 - Cedar-Sammamish		70091
View	70093	5	Water	Bioassessment	EVANS CREEK	8 - Cedar-Sammamish		70093
View	70094	5	Water	Bioassessment	UNNAMED CREEK (TRIB TO EVANS CREEK)	8 - Cedar-Sammamish		70094
View	70109	5	Water	Bioassessment	SQUIBBS CREEK	8 - Cedar-Sammamish		70109
View	70110	5	Water	Bioassessment	IDYLVWOOD CREEK	8 - Cedar-Sammamish		70110
View	70111	5	Water	Bioassessment	UNNAMED CREEK (TRIB TO LAKE SAMMAMISH)	8 - Cedar-Sammamish		70111
View	70112	5	Water	Bioassessment	TIBBETTS CREEK	8 - Cedar-Sammamish		70112
View	70113	5	Water	Bioassessment	EBRIGHT CREEK	8 - Cedar-Sammamish		70113
View	70114	5	Water	Bioassessment	EDEN (ETON) CREEK	8 - Cedar-Sammamish		70114
View	70119	5	Water	Bioassessment	SWAMP CREEK	8 - Cedar-Sammamish		70119
View	70122	5	Water	Bioassessment	PETERS CREEK	8 - Cedar-Sammamish		70122
View	70123	5	Water	Bioassessment	UNNAMED CREEK (TRIB TO SAMMAMISH RIVER)	8 - Cedar-Sammamish		70123
View	70124	5	Water	Bioassessment	UNNAMED CREEK (TRIB TO SAMMAMISH RIVER)	8 - Cedar-Sammamish		70124
View	70125	5	Water	Bioassessment	UNNAMED CREEK (REDMOND 74 CREEK)	8 - Cedar-Sammamish		70125
View	70127	5	Water	Bioassessment	GOLD CREEK	8 - Cedar-Sammamish		70127
View	70128	5	Water	Bioassessment	UNNAMED CREEK (TRIB TO SAMMAMISH RIVER)	8 - Cedar-Sammamish		70128
View	70129	5	Water	Bioassessment	UNNAMED CREEK (TRIB TO SAMMAMISH RIVER)	8 - Cedar-Sammamish		70129
View	70130	5	Water	Bioassessment	UNNAMED CREEK (TRIB TO SAMMAMISH RIVER)	8 - Cedar-Sammamish		70130
View	70132	5	Water	Bioassessment	RAVENNA CREEK	8 - Cedar-Sammamish		70132
View	70133	5	Water	Bioassessment	THORNTON CREEK, S.F.	8 - Cedar-Sammamish		70133
View	70134	5	Water	Bioassessment	MCALEER CREEK	8 - Cedar-Sammamish		70134
View	70135	5	Water	Bioassessment	LYON CREEK	8 - Cedar-Sammamish		70135



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92 Matched Listings

View	ListingID	Proposed Category	Medium	Parameter	Waterbody Name	WRIA	WQ Improvement Project	WQAtlas Map Link
View	70136	5	Water	Bioassessment	UNNAMED CREEK (TRIB TO LAKE WASHINGTON)	8 - Cedar-Sammamish		70136
View	70137	5	Water	Bioassessment	UNNAMED CREEK (TRIB TO LAKE WASHINGTON)	8 - Cedar-Sammamish		70137
View	70138	5	Water	Bioassessment	TAYLOR CREEK	8 - Cedar-Sammamish		70138
View	70139	5	Water	Bioassessment	UNNAMED CREEK (TRIB TO LAKE WASHINGTON)	8 - Cedar-Sammamish		70139
View	70140	5	Water	Bioassessment	UNNAMED CREEK (TRIB TO LAKE WASHINGTON)	8 - Cedar-Sammamish		70140
View	70141	5	Water	Bioassessment	BLACK RIVER	9 - Duwamish-Green		70141
View	70142	5	Water	Bioassessment	MILL CREEK	9 - Duwamish-Green		70142
View	70143	5	Water	Bioassessment	HARRISON CREEK	9 - Duwamish-Green		70143
View	70144	5	Water	Bioassessment	SPRINGBROOK (MILL) CREEK	9 - Duwamish-Green		70144
View	70145	5	Water	Bioassessment	UNNAMED CREEK (TRIB TO SPRINGBROOK CREEK)	9 - Duwamish-Green		70145
View	70146	5	Water	Bioassessment	UNNAMED CREEK (TRIB TO SPRINGBROOK CREEK)	9 - Duwamish-Green		70146
View	70147	5	Water	Bioassessment	UNNAMED CREEK (TRIB TO SPRINGBROOK CREEK)	9 - Duwamish-Green		70147
View	70148	5	Water	Bioassessment	UNNAMED CREEK (TRIB TO CEDAR RIVER)	8 - Cedar-Sammamish		70148
View	70157	5	Water	Bioassessment	UNNAMED CREEK (TRIB TO DUWAMISH RIVER)	9 - Duwamish-Green		70157
View	70158	5	Water	Bioassessment	UNNAMED CREEK (TRIB TO DUWAMISH WATERWAY)	9 - Duwamish-Green		70158
View	70159	5	Water	Bioassessment	UNNAMED CREEK (TRIB TO DUWAMISH RIVER)	9 - Duwamish-Green		70159
View	70160	5	Water	Bioassessment	UNNAMED CREEK (TRIB TO DUWAMISH RIVER)	9 - Duwamish-Green		70160
View	70161	5	Water	Bioassessment	JENKINS CREEK	9 - Duwamish-Green		70161
View	70162	5	Water	Bioassessment	JENKINS CREEK	9 - Duwamish-Green		70162
View	70163	5	Water	Bioassessment	UNNAMED CREEK (TRIB TO GREEN RIVER)	9 - Duwamish-Green		70163
View	70164	5	Water	Bioassessment	MULLEN SLOUGH	9 - Duwamish-Green		70164

View	70166	5	Water	Bioassessment	UNNAMED CREEK (TRIB TO GREEN RIVER)	9 - Duwamish-Green	70166
View	70167	5	Water	Bioassessment	UNNAMED CREEK (TRIB TO GREEN RIVER)	9 - Duwamish-Green	70167
View	70169	5	Water	Bioassessment	CRISP CREEK	9 - Duwamish-Green	70169
View	70170	5	Water	Bioassessment	CRISP CREEK	9 - Duwamish-Green	70170
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92 Matched Listings

View	ListingID	Proposed Category	Medium	Parameter	Waterbody Name	WRIA	WQ Improvement Project	WQAtlas Map Link
View	70171	5	Water	Bioassessment	UNNAMED CREEK (TRIB TO GREEN RIVER)	9 - Duwamish-Green		70171
View	70175	5	Water	Bioassessment	HILL (MILL) CREEK	9 - Duwamish-Green		70175
View	70183	5	Water	Bioassessment	UNNAMED CREEK (TRIB TO BIG SOOS CREEK)	9 - Duwamish-Green		70183
View	70186	5	Water	Bioassessment	BIG SOOS CREEK	9 - Duwamish-Green		70186
View	70187	5	Water	Bioassessment	LITTLE SOOS CREEK	9 - Duwamish-Green		70187
View	70189	5	Water	Bioassessment	JUDD CREEK	15 - Kitsap		70189
View	70190	5	Water	Bioassessment	SHINGLE MILL CREEK	15 - Kitsap		70190
View	70191	5	Water	Bioassessment	COAL CREEK	8 - Cedar-Sammamish		70191
View	70200	5	Water	Bioassessment	LITTLE BEAR CREEK	8 - Cedar-Sammamish		70200
View	70202	5	Water	Bioassessment	NORTH CREEK	8 - Cedar-Sammamish		70202
View	70217	5	Water	Bioassessment	LITTLE PILCHUCK CREEK	7 - Snohomish		70217
View	70220	5	Water	Bioassessment	NORTH CREEK	8 - Cedar-Sammamish		70220
View	70224	5	Water	Bioassessment	PICNIC CREEK	8 - Cedar-Sammamish		70224
View	70236	5	Water	Bioassessment	SCRIBER CREEK	8 - Cedar-Sammamish		70236
View	70238	5	Water	Bioassessment	SILVER CREEK	8 - Cedar-Sammamish		70238
View	70242	5	Water	Bioassessment	UNNAMED CREEK (TRIB TO SCRIBER CREEK)	8 - Cedar-Sammamish		70242
View	70251	5	Water	Bioassessment	GLADE BEKKEN (TRIB 30)	5 - Stillaguamish		70251
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