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To: [ECY RE 303d](#)
Cc: [Majewski, Janell](#)
Subject: Comments on Proposed Water Quality Assessment and 303(d) List
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Attachments: [image002.jpg](#)

To:
Water Quality Program
Washington State Department of Ecology

Thank you for the opportunity to comment on the proposed Water Quality Assessment. On behalf of the Surface Water Management Division of Snohomish County Public Works, I offer the following comments on proposed listings for lakes in Snohomish County:

Proposed Changes from Category 2 (Waters of Concern) to Category 1 (Meets Tested Standards) for Total Phosphorus

The following listings for Total Phosphorus are proposed to be changed from Category 2 to Category 1. The Category 2 listings were based on the 2003 Snohomish County State of Lakes Report describing these lakes as at risk of impairment. It is not clear on what basis the proposed listings would be changed to Category 1. Data from each of these lakes show statistically significant trends toward increasing total phosphorus concentrations as of 2010, as described in the 2010 State of the Lakes Update reports for these lakes. Snohomish County considers these lakes to be at risk of future impairment if the trends continue. Therefore, we request that the listings remain Category 2 (Waters of Concern). (I also submitted this same comment for each individual listing.)

Listing ID	WRIAs	Waterbody Names	Ecology Proposed Category	2012 Category	Parameter	Medium
22452	5 - Stillaguamish	HOWARD LAKE	1	2	Total Phosphorus	Water
22560	7 - Snohomish	LOST LAKE	1	2	Total Phosphorus	Water
6353	8 - Cedar-Sammamish	MARTHA LAKE	1	2	Total Phosphorus	Water
43024	7 - Snohomish	STEVENS LAKE	1	2	Total Phosphorus	Water
22476	8 - Cedar-Sammamish	STICKNEY LAKE	1	2	Total Phosphorus	Water

Proposed Category 2 (Waters of Concern) Listing for Invasive Exotic Species in Shoecraft Lake

Listing ID #4665 proposes to retain a Category 2 listing for Invasive Exotic Species in Shoecraft Lake. Shoecraft Lake was, in fact, free of invasive Eurasian watermilfoil plants from 2000 to 2007. However, the lake was re-infested with milfoil from adjacent Goodwin Lake in 2008. By 2010, the milfoil plants had spread again around much of the littoral area of the lake. Snohomish County has been performing herbicide treatments or hand removal of milfoil in Shoecraft Lake every year from 2008 to the present. Therefore, we request that Listing #4665 be changed to Category 4C Invasive Exotic Species to reflect the actual status of Invasive Exotic Species in the lake as of 2010.

Thank you for considering these comments. Please let me know if you have questions.

Gene Williams | Senior Planner II - Lakes

Surface Water Management

Snohomish County

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