March 21, 2008

Mr. Michael Herold
Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Re: Comments on Draft 2008 303(d) Listing

Dear Mr. Herold:

Thank you for the opportunity to comment on the draft 2006 303(d) List. We remain concerned with the listing of the "Longview Ditches" (referred to in this letter as the Ditches).

System Description
The City of Longview is surrounded by a man-made and actively-maintained system of levees, ditches, and pumps built to manage groundwater and stormwater and defend the city from flooding by the Cowlitz and Columbia Rivers.

Due to the elevations of the Ditches with respect to the groundwater table, the Ditches receive a continuous inflow of groundwater (which is naturally low in oxygen and iron-rich). The pumps run year-round, so the residence time of stormwater in the system is measured in minutes and hours. The levees and pumps also create a physical barrier to the rivers, so there is no salmon access into the Ditches.

The system affords no recreation access to ditch waters. In fact, the channels not suitable for recreation. Side slopes are typically steep (2:1 or less) with typically very soft beds (several feet of muck – unsupportive of human weight). They are frequently interrupted by gates, culverts, and weirs and are seasonally stocked with animal traps (to protect the levees).

Over-arching Concerns
Because the Ditches are pumped to the Columbia and Cowlitz Rivers, they are classified as tributaries to the Columbia River. By default the Ditches are assigned the same water quality classification as the Columbia River. Moreover, the ditches are by default classified as primary contact recreation waters. Both designations are grossly inappropriate. The City requests their redress per WQP Policy 1-11 (Section 7: Other Assessment Considerations, p.18 "Listing Challenges and Other Situations") or other common sense policy.

Specific Concerns
A new listing, 46979 was created for a bogus ditch segment. This listing must be eliminated and the Douglas Street samples should be folded back into segment 10437 were it belongs. This is consistent with the Ecology's past studies on the Ditches and is consistent with the other 303(d) Ditch listings. This new segment is a quirky corner of township-range-section 08.0N - 02.0W – 32 and represents less than 14,000 square feet. It was chosen historically as the geographic beginning of the 10437 segment. Changing it now just adds cost, time, and hassle.

The method used to process the 2006 data submitted for the ditches is inconsistent with WQP Policy 1-11.

Section 6: Assessment Methodology, p.15:

> " Only one parameter value per day per segment will be used in the assessment. Replicate samples taken at the same time and location will be averaged."

Instead replicate samples were treated as discrete data points and not averaged together. The QAPP called for replicates to reduce the fecal method's (SM 9221 E) inherent variability not to aggravate it.

Section 8a: Specific Submittal and Assessment Criteria - Bacteria, p.19:

> "A mean value will be calculated from multiple data points collected in the same day and waterbody segment to reduce the effects of sample variability inherent in bacteria sampling. To reduce concerns of low bias when the data are later used to calculate a geometric mean, the daily mean will be calculated as an arithmetic mean. The resulting single representative data point for the sampling event will be used in the assessment."

Instead, discrete sample locations within segments 10434, 10435, 10437, and 46964 were processed individually across the sample season. Aside from being incorrect, this approach effectively precludes the use of fecal testing as a tool to identify sources of water quality impairment. These ditch segments are already tiny – one to three acres each; so the number of samples required to control variability during an investigation would be cost prohibitive [the stated reason for the policy's approach].

When the segments are recalculated, 10437 will qualify as a Category 1 or 2 – not Category 5. During the investigation that generated this data, no potential sources were identified for this segment. Potential sources were identified for the other three and were either addressed or are still being addressed.

New listing 46984 shares the same problems. Replicates were treated as discrete values. Besides, the data was re-submitted at Ecology's request to show that the data was not valid for submission because it was taken in just down stream of a fresh deer carcass.

The City of Longview remains committed to the assessment and quality of its surface waters and appreciates the outreach and technical assistance provided by your department. Please keep us informed of any decisions and/or re-analysis regarding these issues. If you have any questions, please call me at (360) 442-5210.

Sincerely,

Josh Johnson, P.E.
Stormwater Manager

cc. Jeff Cameron, PE – Public Works Director, City of Longview
Judi Strayer – Manager, Consolidated Diking Improvement District #1