

From: [Harry Bell](#)
Date: Friday, February 15, 2008 7:39:39 AM
Posted At: Inbox
Conversation: 303d on Sekiu River & Susan Braley
Subject: 06-1of2-303d on Sekiu River & Susan Braley

Hi Ken

Thanks for you help at the workshop last Friday. What I now remember that I was trying to ask was about the 2008 proposed listing for the Sekiu River. The temperature data appear to be well within the standards for many years except for 2004. That year was a drought year--which means low rainfall and a lot of sun both of which are likely to have caused the high temperatures. Also, I am not aware of, but am looking into, timber harvest activities that could have contributed to the temperature increase.

I have two questions. 1) How did DOE arrive to a listing decision with this data? 2) If it were a mistake, is there a way to fix it?

Also, please forward this to Susan Braley. We had a nice discussion after the workshop and she was going to send me a copy of the USFS Yellow Jacket management plan. I expect that you and she are quite busy with the workshops but would like to get a copy when it is convenient for her.

**Thanks Again
Harry Bell**

March 21, 2008

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

Attn: Ken Koch

Dear Mr. Koch

This letter is in response to Ecology's request for comments on the draft 2008 Assessment of Water Quality. These comments pertain to the following water segments proposed for the 303(d) list. I have used the listing ID number to indicate water segments of concern.

Sekiu River North Fork	7690*
Sekiu River North Fork	48292*
Sekiu River North Fork	48905
Sekiu River North Fork	48904
Sekiu River North Fork	48903*
Sekiu River North Fork	48902*
Sekiu River South Fork	7691
Sekiu River South Fork	48906*
Sekiu River	48896*
Sekiu River	48901*
Sekiu River	7689*
Coal Creek	6763
Umbrella Creek	48916

Your records show that those water segments marked with and * have multiple year temperature data that show no excursions above listing criteria but were listed because of data collected only in 2004. Even in 2004, the amount of exceedance was very small. If you check the weather records for 2004 you will find that we had a hot dry summer. All waters on the North Olympic Peninsula were at minimum flows and exposed to warm air temperatures. I believe that the town of Neah Bay ran out of domestic water.

Also, on all of the segments above, the only land use is commercial timber harvest. During the time periods of temperature collection there was virtually no timber harvest that could have significantly contributed to warm water temperatures.

It is interesting to note that no data was collected after 2004 that would have helped demonstrate that all of the water segments listed above are naturally warm and frequently do not meet the temperature criteria during our warm summers.

Lastly, I could not find designated uses for these waters. How do you apply temperature criteria without first determining designated uses?

Since all of these water segments are naturally warm they should not be classified as impaired and should be removed from the 303 (d) proposed list. If some are already on the permanent list please provide instructions on how to appeal their listing to the EPA

Thank you for the opportunity to comment.

Harry Bell
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