



**PUBLIC WORKS ENVIRONMENTAL ENGINEERING**

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March 21, 2008

Mr. Ken Koch  
Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504-7600

**Reference: Draft 2008 Water Quality Assessment and 303(d) List**

Dear Mr. Koch,

This letter is being provided to you in regards to the public comment period for the "Draft 2008 Water Quality Assessment and 303(d) List." The City of Kent is concerned about the recent proposed 303(d) listings for Lake Meridian for the following parameters: 2,3,7,8-TCDD, Dieldrin, Hexachlorobenzene, PCB, Total Chlordane and Toxaphene. Additionally, elevated levels of mercury in fish tissue (though not reaching the listing criteria), were noted in recent reports and as a Category 1 parameter on the proposed 2008 303d list. The City would like to take this opportunity to present our concerns regarding the testing methods and limited number of observations used as the basis for the proposed listings.

The potential listings are based on a very limited number of observations from selected fish tissue burden of contaminants. There were only two fish samples for pesticides, PCB's and other toxins, and 18 sampled for mercury. You may or may not be aware that Lake Meridian is on average planted with over 15,000 rainbow trout and 30,000 kokanee fry salmonids each year by the Washington Department of Fish and Wildlife (see <http://wdfw.wa.gov/fish/plants/index.htm>). Hatchery fish are known to have measurable mercury concentrations higher than health advisory standards. PCBs are also bioaccumulating in hatchery origin fish. This is particularly important because the fish sampled in the recent study "Washington State Toxics Monitoring Program: Contaminants in Fish Tissue from Freshwater Environments in 2006" included both large mouth bass (a known piscivore which likely feeds on the fish planted in Lake Meridian) and kokanee, one of the planted fish species that may have bioaccumulated toxins during their stay in the hatchery.

It seems that a recommendation from an Ecology report that uses surrogates for measuring effects to biota (i.e., introduced biota to Lake Meridian) requires more investigation on source and pathway for contamination to fish. Otherwise, the City will be required under the TMDL process to eventually develop an effective Detailed Implementation Plan that will address the true sources rather than potential possible

generic sources. An effective cleanup plan cannot be developed if sources and detailed dynamics among media (and eventual bioaccumulation) are not fully understood.

Additionally, other studies such as "Mercury in Edible Fish Tissue and Sediments from Selected Lakes and Rivers of Washington State" collected 3 sediment samples at Lake Meridian in which only total mercury was tested and not methylmercury. Total mercury concentrations measured in sediment does not explain a path that would make this contaminant bioavailable and warrants further investigation. Furthermore, to the best of our knowledge there is no source for mercury in the basin which makes the presence of this contaminant an issue that likely transcends the jurisdiction of the City.

It is the City's belief that the results of the recent study warrants significantly more research before listings are made. At the very least a detailed pathways analysis is needed along with additional sampling to verify the current concentrations levels and to be able to identify whether or not controllable non-point sources are the cause for elevated levels.

The City respectfully requests a briefing by the appropriate Ecology Representative to discuss the department's rationale for the proposed listing. Please contact Matt Knox at (253) 856-5551 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Mactutis". The signature is fluid and cursive, with a prominent initial "M".

Michael Mactutis, P.E.  
Environmental Engineering Manager

Cc: Matt Knox, Environmental Ecologist, City of Kent  
Larry Blanchard, Public Works Director, City of Kent