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April 29, 2008

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

Re: *Water Quality Assessment and Section 303(d) List Comments*

Dear Ken:

Attached are the City of Federal Way's comments concerning the recently compiled Department of Ecology 2008 Water Quality Assessment and Section 303(d) List. Our primary concern is that three Federal Way Category 1 listings (Meets Tested Standards for Clean Waters) were removed, while at that same time three Category 5 listings (Polluted Waters that Require a TMDL) were not (see attached table). The reasoning for how Ecology removes a listing seems inconsistent with how a listing is selected to remain.

Thanks for the opportunity to provide these comments. Please contact me at (253) 835-2756 if there are questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Smith".

Dan Smith
Surface Water Quality Program Coordinator

Enclosure

cc: Paul Bucich, P.E., Surface Water Manager
Project File/DS
Day File

City of Federal Way's Comments Concerning the Recently Compiled Department of Ecology 2008 Water Quality Assessment and Section 303(d) List.

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Category	Waterbody	Listing ID	Parameter	Comments
1	Lakota Creek	15830	Fecal Coliform	Why was this listing (Meets Standards for Clean Waters) removed? The original listing basis used Seattle-Metro data from 1987 and 1988. These data are not any less current or less credible than the Category 5 listings (15835, 13965, 15887) that Ecology has chosen to retain.
1	Hylebos Creek, WF	12572	Temperature	Why was this temperature listing at SR 99 (Meets Standards for Clean Waters) removed? The original listing basis used Seattle-Metro data from 1987 and 1988. These data are not any less current or less credible than the Category 5 listings (15835, 13965, 15887) that Ecology has chosen to retain.
1	Hylebos Creek, WF	12577	Temperature	Why was this temperature listing at S. 359 th St. (Meets Standards for Clean Waters) removed? The original listing basis used Seattle-Metro data from 1987 and 1988. These data are not any less current or less credible than the Category 5 listings (15835, 13965, 15887) that Ecology has chosen to retain.
5	Joe's Creek	15835	Fecal Coliform	Why does this listing (Polluted Waters that Require a TMDL) remain if a similarly determined Category 1 listing (15830) was removed? Both of these Category 1 and Category 5 listings were based upon 20 year old data, but Ecology has decided to remove only the Category 1 listing.
5	Redondo Creek	13965	Fecal Coliform	Why does this listing (Polluted Waters that Require a TMDL) remain if a similarly determined Category 1 listing (15830) was removed? Both of these Category 1 and Category 5 listings were based upon 20 year old data, but Ecology has decided to remove only the Category 1 listing.
5	Hylebos Creek, WF	15887	Fecal Coliform	Why does this listing (Polluted Waters that Require a TMDL) remain if a similarly determined Category 1 listing (15830) was removed? Each of the Category 1 and Category 5 listings were based upon 20 year old data, but Ecology has decided to remove only the Category 1 listing.