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December 8, 2004

Department of Ecology
Water Quality Program
DEC 15 2004

Mr. Ken Koch, Coordinator
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 2002/2004 Water Quality Assessment and Section 303(d) List. 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
Water Quality Coordinator

DS:dl

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 2002/2004 Water Quality Assessment and Section 303(d) List.

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Category	Waterbody	Listing ID	Parameter	Comments
2	Hylebos Creek	6792	Dissolved Oxygen	The listing basis does not indicate the sampling date(s). In addition, Federal Way questions whether the sampling, performed by the Hylebos Stream Team, meets the state's requirements for credible water quality data pursuant to Engrossed Second Substitute Senate Bill 5957.
4c	Steel Lake	4689	Invasive Exotic Species	The listing is based upon a 2000 Ecology survey finding Eurasian watermilfoil (milfoil). This listing is unfounded due to the following: (1) In 2002, an active aquatic weed management program was implemented, including an annual milfoil eradication program; (2) In 2003, the Department of Ecology approved the Steel Lake Integrated Aquatic Vegetation Management Plan; and (3) In 2004, the city formally created Lake Management District Number One for Steel Lake, that will effectively manage aquatic weeds for a ten year period.
5	Joe's Creek	15835	Fecal Coliform	Ecology website interactive map identifies the impacted stream segment to be west of the actual location of Joe's Creek.
5	Redondo Creek	13965	Fecal Coliform	This listing indicates the location as the city as Federal Way, but sampling occurred at the mouth of Redondo Creek, which is within Des Moines city limits.
5	Steel Lake	10717	Fecal Coliform	Recent fecal coliform data generated by the Department of Ecology (see <i>Lake Bacteria Sampling Project, 2003, DOE, Maggie Bell-McKinnon</i>) documents concentrations that meet water quality standards, negating the 1998/1999 King County data for which this listing is based.
5	Hylebos Creek	17518	Temperature	Federal Way questions the validity of our own temperature data that was submitted to Ecology, and requests that it be withdrawn as a basis for this listing determination. Specifically, a closer review of the city's activity log for the Hylebos Creek water quality station at S. 373 rd shows several anomalies (1) lost temperature data due to a power failure beginning 8/17/01, and (2) the measurement of ambient air temperature during a stream gravel removal project on 8/19/02, causing the probe to be suspended above the water level. Additionally, all data submitted for this listing determination was generated prior to the installation of significant stilling well improvements in 2004. It is also important to note that Ecology (K. Koch) has expressed a concern that the quality of data is QA Level 3, and that it may not meet the state's requirements for credible water quality data.
5	Hylebos Creek	15887	Fecal Coliform	Seattle-Metro 1987 unpublished data was generated prior to many city-implemented watershed improvements, and should not be used to determine current water quality conditions.